

Exhibit 18

PLAINTIFF HARFORD COUNTY BOARD OF EDUCATION OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT (HARFORD) (SD MSJ NO. 6)

Case No.: 4:22-md-03047-YGR

MDL No. 3047

Member Case No.: 4:23-cv-03065-YGR

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT)
ADDICTION/PERSONAL INJURY) MDL No.
PRODUCTS LIABILITY LITIGATION) 4:22-md-3047-YGR
-----)

THIS DOCUMENT RELATES TO:)

BOARD OF EDUCATION OF HARFORD)
COUNTY V. META PLATFORMS INC.,)
ET AL.)

CASE NO.: 4:23-CV-03065)

Confidential - Pursuant to Protective Order
VIDEOTAPED DEPOSITION DONOVEN BROOKS
Harford County Public Schools Central
Administration Building
102 South Hickory Avenue,
Bel Air, Maryland
Thursday, May 8, 2025, 10:28 a.m.

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1 APPEARANCES:

2 For Plaintiff Harford County Public Schools:

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6
7 For the Defendants Meta Platforms, Inc., f/k/a
Facebook, Inc.; Facebook Holdings, LLC; Facebook
8 Operations, LLC; Facebook Payments, Inc.; Facebook
Technologies, LLC; Instagram, LLC; Siculus, Inc.;
9 and Mark Elliot Zuckerberg:

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21 (Appearance continued on next page.)
22
23
24
25

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APPEARANCES CONTINUED:

For the Defendants Alphabet Inc., Google LLC, and
YouTube LLC:

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For the Defendants TikTok, Ltd.; TikTok, LLC;
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Also Present: Ryan Sohmer, Videographer
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Harford County Public Schools

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I N D E X

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EXAMINATION BY MS. WEIANT 5

E X H I B I T S

NUMBER DESCRIPTION PAGE

EXHIBIT 1 Curriculum Vitae of Donovan Brooks 8

EXHIBIT 2 News article dated 1/8/19 66

titled Harford Schools Include
Mental Health Component in
Active Assailant Training

EXHIBIT 3 Emails, top one dated 82
10/30/18, Subject: Gang
member placements, Bates
HCPS_00226861-62

EXHIBIT 4 Article dated 8/24/18 titled 122
Harford Students Returning
Sept. 4 Should Feel Safer in
School, HCPS Security Chief
Says

EXHIBIT 5 Plaintiff Board of Education 129
of Harford County's Amended
Objections and Responses to
Defendants' Interrogatories
(Set 3)

EXHIBIT 6 Email dated 1/15/18, Subject: 143
MCFSS Conference Call Notes -
Call Reminder Tuesday January
16, 2018 @ 10 am EST, Bates
HCPS_00553865-70

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1 P R O C E E D I N G S

2 * * *

3 THE VIDEOGRAPHER: We are now on the
4 record. My name is Ryan Sohmer. I'm a
5 videographer for Golkow, a Veritext division.
6 Today's date is May 8th, 2025. The time now is
7 10:28 a.m.

8 This video deposition is being held at
9 102 South Hickory Avenue, Bel Air, Maryland. We're
10 here in the matter of Social Media CA MDL 3047,
11 Board of Education of Harford County versus Meta,
12 for the United States District Court, Northern
13 District of California. Our deponent is Donovan
14 Brooks.

15 Counsel will be noted on the
16 stenographic record. Our court reporter is
17 Cindy Hayden and will reswear the witness.

18 * * *

19 DONOVEN BROOKS,
20 having been first duly sworn, was examined and
21 testified as follows:

22 * * *

23 EXAMINATION

24 BY MS. WEIANT:

25 Q. Good morning, Mr. Brooks.

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1 A. Good morning.

2 Q. We met earlier, but my name is
3 Lydia Weiant. I'm with the firm Williams &
4 Connolly. I'm joined by -- with my colleague
5 Andy Keyes, and we represent Google and YouTube in
6 this case.

7 Can you please state your name for the
8 record?

9 A. Donovan Ray Brooks.

10 Q. And you're aware that you are under
11 oath today?

12 A. I am.

13 Q. You gave testimony earlier this morning
14 as a corporate representative of Harford County
15 Public Schools, right?

16 A. Yes.

17 Q. Other than your testimony this morning,
18 have you ever given testimony under oath before?

19 A. Yes.

20 Q. When?

21 A. Over my 23 years as a law enforcement
22 officer.

23 Q. Have you ever been deposed before?

24 A. Yes.

25 Q. Were those depositions in connection

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1 with your work as a law enforcement officer?

2 A. Yes.

3 Q. Can you estimate how many depositions?

4 A. One.

5 Q. You've given one.

6 Do you recall what matter that was for?

7 A. Yes.

8 Q. What was it for?

9 A. It's for a police officer that I
10 terminated from the police department when I was a
11 chief of police who brought about a tortious
12 lawsuit and named me and the town and the -- the
13 mayor in -- in the suit.

14 Q. And that's the -- is that the only
15 testimony you've given under oath before at
16 deposition?

17 A. Yes.

18 Q. Did you do anything to prepare for this
19 deposition?

20 A. Just had brief conversations with the
21 two attorneys here at the table.

22 Q. Did you review any documents?

23 A. No.

24 Q. Did you speak to anyone other than your
25 lawyers about your deposition today?

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1 A. No.

2 Q. Okay.

3 (BROOKS EXHIBIT 1, Curriculum Vitae of
4 Donovan Brooks, was marked for identification.)

5 BY MS. WEIANT:

6 Q. I'm going to show you what has been
7 marked Brooks Exhibit 1. This is a copy of your
8 CV, right?

9 A. Yes.

10 Q. Did you prepare this?

11 A. Yes.

12 Q. When did you prepare this?

13 A. 2017 and updated it in 2024.

14 Q. Okay. So is it up to date with your
15 most recent information?

16 A. Yes.

17 Q. So on the third page, it lists your
18 educational background. You received an associate
19 of applied science in law enforcement
20 administration from Baltimore City Community
21 College in 2009; is that right?

22 A. Yes.

23 Q. And a bachelor in management and
24 leadership from Johns Hopkins?

25 A. Yes.

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1 Q. And a master of science in public
2 safety management from Johns Hopkins?

3 A. Yes.

4 Q. What -- what was your job coming out of
5 school, first job coming out of school?

6 A. What level of school are you talking?

7 Q. I guess, what job did you begin your
8 career with?

9 A. Oh, as -- out of high school or -- I
10 mean, I'm just trying to -- did I begin my career
11 with?

12 Q. Okay. Sorry. Strike that.
13 The first employment history you have
14 listed on your CV is United States Air Force.

15 A. Yes.

16 Q. Okay. And you spent nine years in the
17 Air Force?

18 A. Yeah. Just under ten years, yeah.
19 Like nine years, ten months, yes.

20 Q. What was your position?

21 A. I held a few. Do you want the last
22 one?

23 Q. Can you just give me a quick list of
24 your various positions in the Air Force?

25 A. My first position was presidential

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1 support. I was in the Air Force Presidential Honor
2 Guard. I had top secret clearance. Did work at
3 the White House, the Pentagon.

4 From there, I left and went to a NATO
5 international police unit in Naples, Italy, where I
6 spent time working in a top secret capacity there.

7 And then I came back to the U.S. and
8 worked at Central Command and Special Operations
9 Command. And closed out my career finally doing
10 what I first got trained to do, which was law
11 enforcement, which I didn't really do the first six
12 or seven years of my career.

13 Q. So what did you do after leaving the
14 Air Force?

15 A. Came home and joined the police
16 department. Went to the Baltimore City Police
17 Academy and started my career in civilian law
18 enforcement.

19 Q. And your first position in civilian law
20 enforcement, you said was with the Baltimore City
21 Police --

22 A. Yeah. I went through the Baltimore
23 City Police Academy and started with the Baltimore
24 City School Police in '97.

25 Q. Okay. How long were you with the

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1 Baltimore City School Police?

2 A. 20 years.

3 Q. Did you attend school during that time
4 as well?

5 A. Yes.

6 Q. Some of the degrees you've listed
7 earlier?

8 A. All of those happened -- yeah, all
9 those happened well into my career with
10 Baltimore City School Police.

11 Q. And so those were degrees that you
12 received while --

13 A. Yeah, while --

14 Q. -- working at Baltimore City Police?

15 A. Yeah, while I was with the department,
16 yes.

17 Q. And you -- during that time, you also
18 served part-time as the chief of police at
19 Fairmount Heights Police Department --

20 A. Yes.

21 Q. -- right?

22 What did you do in that position?

23 A. I was the chief of police. So I
24 oversaw the police department. Primarily, what I
25 really spent my time doing was saving the -- the

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1 commission and the accreditation of the department
2 because it was about to lose its Maryland state
3 commission and accreditation as a police
4 department.

5 Q. Why was it about to lose its
6 accreditation?

7 A. A lot of mismanagement with the
8 previous chief who was there and just a lot of
9 administrative and operational things.

10 And primarily, at that time, we code --
11 uniform code reporting to the FBI had not been
12 reported for several years, so -- and, also,
13 mandated statistics that should have been reported
14 to the Maryland State Police. So when I was hired,
15 that was one of the things I was asked to focus on
16 so that they would not lose commission.

17 Q. And you said your time was spent saving
18 the commission. Do you think you saved the
19 commission?

20 A. Oh, I know I did. The department is
21 thriving.

22 Q. So over the course of your 20 years
23 with the Baltimore City School Police Force, what
24 were your various positions throughout that time?
25 Did they change?

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1 A. They did. I started off as a
2 school-based officer, which I refer to as "school
3 resource officers." And I operated in that
4 capacity for a number of years.

5 And I pretty much worked in every
6 academic environment during that time period from
7 pre-K through 12, special programs. Yeah, I
8 touched -- during that time period, I touched every
9 type of population in our school district in
10 Baltimore City that we had -- student population we
11 had.

12 Q. Were you stationed at different
13 schools, or were you stationed at a central office
14 and then would travel for work to the --

15 A. No. In the very beginning, I was --
16 yeah, when -- when the school year would start,
17 officers would get their assignment, so...

18 And there were schools that I was the
19 officer there for two years. There were schools I
20 was there for three years.

21 Q. And that was all within your capacity
22 as a school resource officer? You --

23 A. Yes.

24 Q. Okay. What was your next position
25 after-school resource officer?

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1 A. The next position, I was promoted to --
2 well, I -- I was placed -- I was still a school
3 resource officer. I -- it wasn't a promotion, but
4 I was placed in patrol.

5 Q. And what is patrol?

6 A. So patrol units are responsible for
7 responding -- we call them "sectors." So there
8 were 18 schools in a sector. When calls for
9 service came out, if that school did not have its
10 own full-time SRO, I would respond to that call for
11 service as a patrol unit.

12 Q. How many schools in that district did
13 not have SROs; do you recall?

14 A. That fluctuated. I mean, you got -- at
15 any given time actually deployed inside of a
16 school, we might have had -- like, actually in a
17 school, maybe 70, something like that, at that
18 time, when I first joined, 180-something schools.

19 Q. So you would go out when you received
20 calls for service. What types of calls for service
21 would you respond to?

22 A. When I first went on patrol -- I mean,
23 it varied. Theft, assaults, vandalism, disorderly,
24 a lot of -- lots and lots of disorderly, and lots
25 of emergency petitions for mental health situations

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1 because we were the transport. If a student was
2 declared needing any of mental health intervention,
3 we did the transport to the hospital.

4 Q. How often would you say you did that?

5 A. The --

6 Q. The transportation for mental health?

7 A. Frequently.

8 Q. So you started as an SRO stationed at
9 schools -- at the various schools, and then you
10 went to SRO patrol?

11 A. Yes.

12 Q. What position did you hold after that?

13 A. I was promoted to corporal.

14 Q. And what is that?

15 A. That is first-line supervisory duties,
16 working under the guidance of the sector sergeant,
17 sector corporal.

18 So now it's a little bit different
19 because -- responsible for other officers,
20 scheduling, reviewing reports; constantly in the
21 car all day now, you know, except, you know, riding
22 around, checking on officers; stopping in, speaking
23 with administrators; collecting reports at the end
24 of every day; checking in with officers to see what
25 their needs are; delivering items out in the field

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1 to officers and responding to calls for service on
2 a radio.

3 So even if a patrol unit gets a call,
4 depending on what that call is, probably as a
5 corporal will show up to back up and support the
6 patrol officer.

7 Q. Did you hold any other positions after
8 corporal?

9 A. Yes.

10 Q. What position did you hold after that?

11 A. Sergeant, or as we -- as we refer to
12 it, area commander sergeant.

13 Q. And what were your responsibilities as
14 sergeant, area commander?

15 A. Responsible for all of the schools in
16 my sector, all of the police officers; writing
17 evaluations on the officers, biannual evaluation,
18 evaluating corporal; determining what resources
19 were needed for my officers in the field; reviewing
20 reports; scheduling training; assigning, directing
21 and scheduling both regular duty-hour assignments
22 and after-hour assignments for officers.

23 Q. Any positions after sergeant?

24 A. Not with the Baltimore City School
25 Force.

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1 Q. When did you leave the Baltimore City
2 School Force?

3 A. January of 2018.

4 Q. And in your time with Baltimore City,
5 you mentioned you would respond to calls for
6 service. Did you respond to violent incidents at
7 the schools?

8 A. Yes.

9 Q. What types of violent incidents?

10 A. Primarily, fights.

11 Q. Did you ever respond to incidents of
12 gun violence?

13 A. Yes.

14 Q. Do you know how many?

15 A. I do not.

16 Q. Would you say less than five, more than
17 five?

18 A. More than five.

19 Q. More than ten?

20 A. Yes.

21 Q. 25?

22 A. So I need to clarify, because you're
23 asking me about gun violence proximity. So because
24 schools in Baltimore City are like -- community
25 school, like, sit right in the middle of

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1 communities, you know, you can have the front door
2 to school, and then you can have Ms. Ethel's house
3 like 20 feet away, right?

4 Q. Yeah.

5 A. So, oftentimes, because of proximity,
6 yeah, I would respond to gun violence because, you
7 know, if there was a run and gun battle at 11:00 in
8 the morning and we're locking the school down and
9 we're responding, yeah, that -- you know, you got
10 two people shooting at each other, which was not
11 infrequent -- which was pretty frequent in
12 proximity of a school, then it impacted the school,
13 even if it wasn't somebody bringing the gun in the
14 school or whatever.

15 So there were lots of situations where
16 there was gun violence that surrounded school that
17 I had to respond to.

18 Q. Would you -- throughout your 20-year
19 career with Baltimore City, did you -- Baltimore
20 City Schools Police, did you respond to violent
21 incidents in all of the positions you listed
22 earlier, or was that at certain points in your
23 career?

24 A. All of them.

25 MR. LEGG: Objection to form.

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1 THE WITNESS: I'm sorry?

2 MR. LEGG: It's okay.

3 THE WITNESS: All of them.

4 BY MS. WEIANT:

5 Q. What was your next position after
6 Baltimore City School Police?

7 A. The position here at Harford County.

8 Q. And you said you left --

9 A. Supervisor.

10 Q. -- in January of 2018. Is that also
11 when you started with Harford County Public
12 Schools?

13 A. Yes.

14 Q. And what was your title when you
15 started with Harford County Public Schools?

16 A. Coordinator of safety and security.

17 Q. Is that your current title as well?

18 A. Supervisor of safety and security.

19 Q. When did you switch from coordinator of
20 safety and security to supervisor?

21 A. When I wrote a proposal to the
22 superintendent of the board to expand the -- the
23 department. So manpower increased and subsequently
24 aligned with a different title based on the growth
25 of the department.

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1 Q. Do you remember what year that was?

2 A. That was 2023.

3 Q. When you began as coordinator of safety
4 and security, what were your primary job
5 responsibilities?

6 A. To respond to situations inside of --
7 at our schools; support the schools; to, you
8 know -- everything safety and security.

9 When I started this job, it was
10 literally a two-person office. Safety and security
11 for the district was handled by myself, and my
12 support person was my assistant, my office
13 assistant.

14 Q. Was that their title, "office
15 assistant"?

16 A. Yeah, she was my -- yeah, she was my --
17 "administrative assistant" was her title.

18 Q. And what was her name?

19 A. Susan Cuomo.

20 Q. Is she still with --

21 A. No. She retired.

22 Q. What year did she retire?

23 A. She retired in 2022. I want to say
24 2022.

25 Q. So between the time -- while serving as

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1 coordinator of safety and security until 2023, did
2 you have staff under you before you took the
3 position of supervisor?

4 A. Yes. I had my assistant and seven --
5 it started with seven. We piloted an expansion of
6 the office. We piloted a program, and we hired
7 seven people.

8 Q. What year was that?

9 A. That was 2021 when we started the
10 pilot.

11 Q. So until 2021, was there any other --
12 were there any other staff members in the safety
13 and security department other than you and
14 Ms. Cuomo?

15 A. No. That was pretty much it. 2020 is
16 when we started to -- well, I'm sorry. 2020 is
17 when we -- when we started to expand, right around
18 the time of COVID, when we were just getting into
19 bringing on our school safe liaisons.

20 Q. Who do you report to?

21 A. Now I report to Ms. Cathy Bendis and
22 Dr. Eric Davis. Those are two -- my two reports.

23 Q. Who is Cathy Bendis?

24 A. She is the assistant superintendent of
25 operations.

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1 Q. And who is Eric Davis?

2 A. He is the chief of administration,
3 second in command of the school district.

4 Q. Over the course of your career, have
5 you ever worked as a teacher?

6 A. I've worked as an instructor but not as
7 a teacher.

8 Q. What do you mean by "instructor"?

9 A. I was a certified law enforcement
10 instructor for ten years, both firearms and
11 academic classroom instructor, certified through
12 the Maryland State Police.

13 Q. And who were you instructing?

14 A. Well, in classroom instruction, law
15 enforcement. Firearms instruction, I'm a certified
16 firearms instructor for both civilian and law
17 enforcement.

18 Q. Have you ever taught in a public school
19 setting?

20 A. Yes. I've trained in a public school
21 setting but not classroom teacher, no.

22 Q. Okay. Have you ever taught in any
23 other school setting in K through 12 classrooms?

24 A. No.

25 Q. Have you ever worked as a principal?

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1 A. Never. No.

2 Q. Have you ever worked as a mental health
3 counselor?

4 A. I don't know. If being a police
5 officer in Baltimore City for 25, 20 years counts,
6 yeah. But other than that, no.

7 Q. Your formal titles have not involved --

8 A. No.

9 Q. -- mental health counseling
10 responsibilities?

11 A. No.

12 Q. And have you ever worked as a nurse?

13 A. No.

14 Q. Or other healthcare provider?

15 A. No.

16 Q. Have you ever worked as a school
17 counselor?

18 A. No.

19 Q. Have you ever worked in a school's IT
20 department?

21 A. No.

22 Q. Can you tell me more about how the
23 department developed and changed between when you
24 joined in 2018 and today?

25 MR. LEGG: Objection to form.

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1 THE WITNESS: Yeah. So, in 2018, when
2 I -- when I came, it was -- I stepped into the role
3 that my -- my, you know, predecessor was in, in the
4 same position as coordinator and any office.
5 Oversaw -- excuse me -- safety and security
6 throughout the district. Supported schools with
7 their safety and security measures and emergency
8 incident plans. Responded for really significant
9 events that schools needed support for.

10 And coming from where I came from,
11 both -- both my military and police background, I
12 just did not see how it was going to be possible
13 to -- for one person to, you know, continue doing
14 those duties. So started changing first in my mind
15 and then, you know, putting it on paper and what --
16 what that vision looked like to be able to support
17 the schools with more than just me.

18 So we piloted a program, the school
19 safe liaison, where we started with seven school
20 safety liaisons who were deployed to schools.

21 And the way I deployed those particular
22 seven was based on data and information I collected
23 on support, looking at what schools I had provided
24 the most support to when it was just myself. So
25 those were schools I said would probably benefit

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1 most. And the program, you know, met with success
2 over the next couple of years.

3 And then, you know, I made requests to
4 increase our manpower there and also made requests
5 to provide supervisory positions as we grew the
6 department, so...

7 So from then to now, yeah, we went from
8 a 2-person operation to now just under a 40-person
9 operation.

10 BY MS. WEIANT:

11 Q. Okay. So you said between 2018 and
12 roughly 2020, it was just you and Ms. Cuomo in the
13 department?

14 A. Yes.

15 Q. Around 2020, you added seven school
16 safety liaisons?

17 A. Yeah. We started that process in '19,
18 but, yeah, we started adding them -- like, started
19 the process of creating the title, the -- working
20 all the HR stuff and then started adding folks.

21 Q. And it was your idea to add these
22 positions?

23 A. Yeah. We talked -- I talked that over
24 with -- at that time, my direct report was
25 Dr. Eric Davis. So we had numerous conversations

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1 of what that would look like.

2 Q. And the -- part of that you mentioned
3 with your military and law enforcement background,
4 you did not see how it was going to be possible for
5 one person to continue fulfilling your duties in
6 the safety and security department. What do you
7 mean by that?

8 A. What I mean by that is that, when you
9 have multiple schools that need various levels of
10 support, it's just not going to be possible for one
11 person to be heading -- heading to Darlington
12 Elementary for a school that's 2 miles from the
13 Pennsylvania line and get a phone call from
14 Joppatowne High School, which is right on the
15 Baltimore County -- on Harford County line, almost
16 an hour away, to say, "Could you come support
17 this?" or what -- you're one person.

18 And so -- also knowing that there were
19 incidents -- one of the things that I saw were,
20 there were incidents that arise to the level of
21 intervention but not necessarily law enforcement
22 intervention.

23 So just based on my background, I
24 started to become a little concerned about things
25 that SROs were being asked to get involved in

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1 where, yeah, although it needed intervention to
2 support the principals a little bit higher than
3 where they were, I didn't necessarily think we
4 needed law enforcement involved in those things.
5 That was part of what I saw as well.

6 And so from a support role and a
7 problem-solving role, I just felt we needed to grow
8 the -- the department and have that type of
9 personnel available to support our schools.

10 Q. When you joined in 2018, were there
11 school resource officers at every school in
12 Harford County Public Schools?

13 A. No.

14 Q. How many were there?

15 A. There were resource officers in every
16 high school and almost every middle. But shortly
17 thereafter -- within a year of me joining, we had
18 them at every high school and every middle school
19 within a year of me joining.

20 Q. As of today are there school resource
21 officers in every high school and every middle
22 school?

23 A. Yes.

24 Q. Do you have any supervisory role over
25 school resource officers?

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1 A. No.

2 Q. So you said you -- there were too many
3 incidents to respond to -- for one person to
4 respond to each incident in the school district on
5 a given day or week?

6 A. Yeah. Not just too many incidents, but
7 there's too much responsibility and safety and
8 security for one person to be responsible for 55
9 schools, 40,000 -- roughly 40,000 students, 6,000
10 employees for one person to be able to support the
11 needs.

12 So not just necessarily incidents, but
13 just the needs, you know, reviewing critical
14 incident reports, emergency plans. You're just one
15 person. You know, you're just not -- you're not --
16 you're just not going to be able to provide
17 adequate support to that many schools and that many
18 communities.

19 Q. And you mentioned situations that might
20 need intervention but not law enforcement
21 intervention and, therefore, maybe not an SRO
22 intervention. What types of interventions are you
23 talking about?

24 (Discussion off the record.)

25 MS. WEIANT: Can we take a break real

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1 quick?

2 MR. LEGG: Looks like we're having some
3 technical difficulties.

4 THE WITNESS: Oh, okay.

5 MR. LEGG: So we're going to take a --

6 MR. KEYES: The Zoom participants got
7 disconnected.

8 THE WITNESS: Uh-huh.

9 THE VIDEOGRAPHER: We are now going off
10 the record at 10:58 a.m.

11 * * *

12 (Whereupon, there was a recess in the
13 proceedings from 10:58 a.m. to 12:21 p.m.)

14 * * *

15 THE VIDEOGRAPHER: We're now going back
16 on the record at 12:21 p.m.

17 BY MS. WEIANT:

18 Q. Welcome back, Mr. Brooks. We just took
19 a short break to address some technical issues.
20 Before we left, we were discussing the structure
21 and changes to the safety and security department
22 since you've joined. We actually had a question
23 pending before we left. So I'm going to reask that
24 question for you.

25 Earlier in your testimony, you

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1 mentioned that there were situations that might
2 need intervention but not law enforcement
3 intervention; and, therefore, they may not need SRO
4 intervention. What types of interventions were you
5 talking about?

6 A. I was talking more about situations
7 where students may have an incident that's a
8 safety-and-security-related incident but more in
9 alignment with breaking a policy or procedure,
10 school policy or procedure, and not necessarily
11 rising to the level of law enforcement, which for
12 me, coming from where I came from, really only
13 wanted law enforcement involved when there was
14 infractions or -- or breaking the law, and, you
15 know, you need that expertise to determine the
16 elements of an incident and whether or not it rises
17 to law enforcement.

18 And I started seeing, you know, fights,
19 minor frays, minor vandalism, de-escalation of
20 students that might be escalated due to agitation,
21 irritation.

22 When teachers aren't necessarily in a
23 place to de-escalate and deal with that because
24 they've got 20 other students in the class, I
25 don't -- I didn't really want them calling SROs to

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1 the class to deal with that, even if the
2 administrator shows up and the person refuses. I'd
3 rather have another layer of safety and security.

4 So that's what I mean by "rise to a
5 level of intervention" but not necessarily wanting
6 a police officer to show up.

7 Q. So that was one of the reasons you
8 adopted safety -- school safety liaisons?

9 A. Yes.

10 Q. You also mentioned that at some point
11 you requested supervisory positions. When was
12 that?

13 A. That would have been the 2022-2023
14 school year.

15 Q. And what position did you think needed
16 to be created?

17 MR. LEGG: Objection to form.

18 THE WITNESS: Regional supervisors.
19 Because with the addition of and the growth of the
20 school safe liaison position, now I just went right
21 back to a situation I had previously.

22 Because now I have the folks, but then
23 if it's all reliant on me to supervise every one of
24 them and address the needs of everyone, then at
25 some point we're going to reach, you know, law of

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1 diminishing returns in terms of what support I can
2 give. So I needed other people to be able to do
3 that.

4 BY MS. WEIANT:

5 Q. And how many -- how many regional
6 supervisors did you request?

7 A. I think initially I requested like
8 five.

9 Q. How many did you -- well, did you get
10 any regional supervisors?

11 A. Three.

12 Q. And that -- those positions began in
13 2022 to 2023 school year?

14 A. Yeah.

15 Q. So as of today, the safety and security
16 department includes yourself, three regional
17 security or three regional supervisors, and then
18 the school safety liaisons below them?

19 A. Yes.

20 Q. How many school safety liaisons are
21 there?

22 A. We have, right now, approximately 30.
23 We've had some to leave and get other positions.
24 Just brought some on recently. But slots, about 30
25 slots.

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1 Q. Are they assigned to specific schools?

2 A. Some. The majority of them are.

3 Q. How do you determine which schools get
4 assigned a specific school safety liaison?

5 A. So what we've done heretofore is we
6 post the position when we have -- so we have two
7 types of SSLs, just to be clear. We have floaters,
8 and then we have those SSLs who are, for all
9 intents and purposes, permanently assigned to a
10 school or fixed to a school.

11 If there's a vacancy at a school where
12 the individual will be assigned to that particular
13 school, the position will be posted. We will say,
14 this school is hiring for an SSL. Once we look at
15 the pool of candidates, we interview with the
16 principal, some other member of their staff and a
17 member of my team, sometimes myself. And that's
18 pretty much --

19 So it's not like I hire ten people and
20 say, "You're going to go here"; "you're going to go
21 there"; "you're going to go there." The school is
22 involved in the hiring process when there's an
23 opening at their school for the SSL. And that's
24 how we did it from its inception.

25 Q. Okay. Are there any other positions

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1 within your department that we have not discussed?

2 A. Just my assistant. That's it.

3 Q. Yeah.

4 And when you are -- when Ms. Cuomo
5 retired, did you hire a new assistant?

6 A. Yes.

7 Q. What -- what's their name?

8 A. Christina Paquette.

9 Q. Outside of your department, who within
10 Harford Public -- Harford County Public Schools do
11 you work most closely with?

12 MR. LEGG: Objection to form.

13 THE WITNESS: I work very closely with
14 technology department. I work very closely with
15 our PIO, our communications office. And I work
16 very closely with Mr. Hennigan's office,
17 Buck Hennigan.

18 BY MS. WEIANT:

19 Q. And which department is that,
20 Mr. Hennigan's department?

21 A. Yeah. The pupil services office,
22 student services.

23 I work with -- I work with the
24 suspension services folks for long term for
25 students that are referred. So I work with Buzz's

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1 office, which is -- all falls under Buck's office.
2 And then I work collaboratively with the office to
3 get my folks trained in CPI training.

4 Q. When you joined Harford County Public
5 Schools and initially hired that first round of
6 school safety liaisons, what prompted you to create
7 that position and hire those employees?

8 A. The fact that I felt there should be a
9 stopgap of support between principals, teachers and
10 law enforcement and that there should be someone to
11 be able to liaise in between there, again, for
12 things that I saw.

13 Like, coming from where I had come
14 from, you know, we had that. There was nothing
15 like that that existed here. So as I saw things
16 happening and got a better grasp of the lay of the
17 land, I felt like we could use this position, you
18 know, to help in our schools.

19 Q. Was anyone else asking to increase
20 safety and security measures at the school around
21 that time?

22 MR. LEGG: Objection to form.

23 THE WITNESS: Safety and security
24 measures? Yeah, safety and security measures.
25 Personnel? At that time, when I first started? I

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1 mean, because I immediately started assessing a
2 need in 2018 shortly after I was here.

3 But security measures, yeah. Because
4 shortly after I was here, we had the tragedy in
5 Parkland. So whenever you have those type of
6 tragedies, you know, security measures and focus on
7 security measures become a lot more magnified.

8 BY MS. WEIANT:

9 Q. At some point, did legislators become
10 more interested in safety and security on school
11 campuses, that you're aware of?

12 A. Absolutely.

13 Q. When was that?

14 A. Is your question, when -- when do I
15 think they became more interested? Is that --

16 Q. Yes.

17 A. -- what you're asking me?

18 Definitely in the aftermath of the
19 Stoneman Douglas shooting, I saw what I would
20 consider an escalation of interest surrounding
21 security measures.

22 Q. And are you familiar with the
23 Maryland Safe to Learn Act?

24 A. Absolutely.

25 Q. Did that play a role in how you hired

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1 new positions for your department?

2 A. I wouldn't say that played a role in
3 the hiring of new positions. I think for -- for me
4 here in the immediate aftermath, that played a role
5 in some security upgrades --

6 Q. What security upgrades?

7 A. -- throughout the district.

8 Some refreshing of cameras and
9 purchasing more radios, things of that nature.
10 But, yeah, here in -- yeah, because I worked very
11 closely with the county executive's office in the
12 aftermath -- in the immediate aftermath of that.
13 And we had conversation about some additional
14 funding for physical security resources,
15 technology -- mostly surrounding technology.

16 But there was no conversation about
17 increasing manpower in the -- in the immediate
18 aftermath of the Stoneman Douglas shooting as it
19 relates to, you know, conversations that was being
20 had with me.

21 Q. Aside from cameras, refreshing cameras
22 and purchasing radios, were the -- were there other
23 safety measures you implemented in response to the
24 Safe to Learn Act?

25 A. Yeah. So we -- yeah, we implemented

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1 every measure that was -- that was passed in the
2 bill. We hired a mental health coordinator. We --
3 we had to either contract or develop an active
4 shooter, active assailant program. We had to
5 create drills and training surrounding active
6 shooter programs.

7 We had to look at threat assessment,
8 threat assessment -- look at our processes, our
9 threat assessment teams, training surrounding
10 threat assessment.

11 So, yeah, we -- we -- yeah, we carried
12 out the mandates based on Maryland Safe to Learn
13 Act.

14 Q. The mental health coordinators you
15 mentioned, are those employees that sit in your
16 department?

17 A. No.

18 Q. Do you have any role in supervising
19 them?

20 A. No.

21 Q. In 2022 to 2023, that school year when
22 you hired regional security coordinators, did you
23 make any other changes to the size of the
24 department?

25 A. Yeah. We hired more school safe

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1 liaisons.

2 Q. Why did you hire more in that 2022 to
3 2023 school year?

4 A. Because we were just having an
5 escalation of, again, those situations that rise to
6 the level of intervention where we -- we -- one,
7 the success of the pilot program; and, two, just
8 the need to support schools with that position.

9 Q. So there was a greater need to support
10 schools at that time?

11 A. There was a need to -- to provide the
12 same services that we were providing at the
13 other -- that the -- that the other schools were
14 not previously getting, that we were only getting
15 that service at seven schools. So we wanted to
16 expand it to other schools.

17 Q. You've mentioned security cameras.
18 When did Harford County Public Schools first
19 install security cameras?

20 A. I have no idea.

21 Q. They were in the buildings when you
22 joined --

23 A. Absolutely.

24 Q. -- in 2018?

25 A. Yeah.

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1 Q. Are -- does Harford County Public
2 Schools have live feed cameras?

3 A. Yes.

4 Q. Where?

5 A. In all of our school buildings.

6 Q. All of the cameras in the school
7 buildings are live feed?

8 A. Yes.

9 Q. Do you have cameras in every classroom?

10 A. We have cameras in no classrooms.

11 Q. Do you have cameras in hallways?

12 A. Yes.

13 Q. In every hallway?

14 A. That, I don't know if we have them in
15 every hallway. But if I had to -- if I had to
16 estimate, we've probably got them in 99 percent of
17 our hallways. But I'm sure there's a hallway here
18 or there that probably could use a camera, maybe.

19 Q. So there are cameras in every school
20 within the school district?

21 A. Yes.

22 Q. Do you have cameras at every entrance
23 of the schools?

24 A. Yes.

25 Q. Do you have cameras on buses?

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1 A. Yes.

2 Q. How does Harford County Public Schools
3 use the footage from these security cameras, if at
4 all?

5 A. How do we use the footage? Sometimes
6 we use it to fulfill subpoena requests when it's
7 requested. And we use it to view incidents,
8 accidents.

9 Yeah, that's pretty much how -- we --
10 we use it to review anything that comes up that we
11 need to, you know, take a look and see if we can
12 get -- if footage even exists on it. So we use it
13 as an investigative tool. Yes.

14 Q. During your time at -- in your
15 position, has anyone requested an upgrade in
16 security cameras?

17 A. Has anyone requested an upgrade? I
18 don't know if I understand your question.

19 Q. Have any teachers or administrators
20 requested that Harford County Public School buy new
21 security cameras to increase their quality or their
22 effectiveness?

23 A. I'm going to say no, because I think
24 our folks understand that we have what are called
25 "camera refreshes." So if a school did reach out

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1 and say, you know, "I want a newer camera over
2 here," we're going to look at where that school
3 falls in the refresh and -- because, you know,
4 those cameras only have a certain lifecycle.

5 So if your school is scheduled for a
6 refresh the 2027-2028 school year and you want
7 newer cameras and that's where your refresh cycle
8 is, then we'll let you know, like, "Hey, 2027-2028
9 you're going to get better cameras than you have
10 now because these cameras are coming to the end of
11 their lifecycle." So these cameras will be
12 whatever it is in 2027 -- you'll have the newer
13 stuff.

14 Q. Does Harford County Public Schools
15 utilize any weapons detection devices?

16 A. Yes.

17 Q. How?

18 A. We utilize -- right now, we utilize it
19 on a -- we utilize one weapons detection system
20 right now that we're try- -- that we're looking at
21 at Joppatowne High School. We use that for entry
22 of students in the morning.

23 We are in a piloting phase of using
24 another weapons detection, which is called
25 OPENGATE. And we are using those weapons

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1 detections to -- we're -- we're using this time to
2 collect data so we can determine how we're going to
3 drive our policy in the future with using these
4 weapons detection devices. So we're using them on
5 a random basis for some after-school events.

6 Q. So Joppatowne High School is the only
7 one that uses weapon detection devices on a daily
8 basis?

9 A. On a daily basis, yes.

10 Q. When did that begin?

11 A. That began, I want to say -- we went go
12 live on that end of October-November time frame. I
13 can't remember exact.

14 Q. Why did you add a weapons -- weapons
15 detection device at Joppatowne High School?

16 A. That weapons detection device was added
17 in the aftermath of the shooting that occurred in
18 September.

19 Q. And before the fall of 2024, Harford
20 County Public Schools did not use any weapons
21 detection devices at any other school?

22 A. No.

23 Q. Did it use it at any events prior to
24 that time?

25 A. No.

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1 Q. Does Harford County Public Schools
2 search its students' property?

3 MR. LEGG: Objection to form.

4 THE WITNESS: When -- are you saying
5 just in general or -- I mean, I'm trying to
6 understand the question.

7 BY MS. WEIANT:

8 Q. Has there ever been a time when school
9 officials have searched students' property?

10 A. Yes.

11 Q. Why would you search students'
12 property?

13 A. You would search a student's property
14 if you have reason to believe or cause to believe
15 that the student may be in possession of
16 contraband, if they may be in possession of a
17 weapon.

18 And based on Maryland law, you would
19 search a student if an administrator determines
20 that the locker or personal belongings of a student
21 should be searched for any of those items as well.

22 Q. Who performs those searches?

23 A. Those searches are typically performed
24 by an administrator or a school safe liaison or
25 school security person.

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1 Q. Do you do any random searches?

2 A. Of student -- no, no random searches of
3 students. If you mean like when they're coming in
4 the door, every fifth student we're going to pull
5 to the side and search their book bag, no, we don't
6 just do random searches like that.

7 Q. Do you do random property searches? So
8 when students are not present, searching their
9 lockers?

10 A. We used to. We suspended that during
11 COVID, and we have not -- we have not resumed that
12 yet.

13 Q. Why haven't you?

14 A. Well, because a lot of the law
15 enforcement agencies have gotten away from the
16 marijuana-sniffing dogs, and that's pretty much
17 what we were doing. We were doing drug dog scans.

18 And so a lot of them are -- I mean, you
19 know, because of the laws changing, a lot of
20 agencies are not spending money to have canines
21 trained on a substance that has either been
22 decriminalized in -- in some cases. You know, the
23 laws have just become more lenient. And -- and I
24 don't think you want to train a dog to sniff
25 fentanyl because it might be the last sniff.

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1 Q. Do you ever go to a student's home and
2 search their home --

3 MR. LEGG: Objection to form.

4 BY MS. WEIANT:

5 Q. -- for any reason?

6 MR. LEGG: Objection to form.

7 THE WITNESS: Do I, or does anybody
8 representing my office?

9 BY MS. WEIANT:

10 Q. Does anyone at Harford County Public
11 Schools go to a student's home to search their home
12 at any time?

13 MR. LEGG: Objection to form.

14 THE WITNESS: No.

15 BY MS. WEIANT:

16 Q. If you received information that led
17 you to believe a student possessed a weapon at
18 home, would you do anything to investigate --

19 A. Can you ask --

20 Q. -- that information?

21 A. Can you ask the question again?

22 Q. If you received information that led
23 you to believe that a student possessed a weapon or
24 had access to a weapon at home, would you do
25 anything to investigate that allegation?

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1 A. Just merely that they might have a
2 weapon in their home?

3 Q. If --

4 A. No.

5 Q. If they also made a threat?

6 A. Yes.

7 Q. How would you investigate their access
8 to a weapon?

9 A. We would notify law enforcement
10 partners and give -- provide them the information
11 that we've been given, especially if there's a
12 nexus to a threat. And then from there, our law
13 enforcement partners would deal with any search
14 that took place at the home.

15 Q. Would that be school resource officers
16 or separate law enforcement partners?

17 A. It could be --

18 MR. LEGG: Object to the scope.

19 THE WITNESS: It could be both or
20 either. If the threat comes in at 10:00 at night,
21 and the nature of the threat dictates that
22 immediate investigation needs to start, that could
23 be a patrol deputy who receives the call. Because,
24 you know, SROs are typically off at 4:00, you know.
25 BY MS. WEIANT:

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1 Q. Does Harford County Public Schools do
2 any searches specifically to find weapons that
3 might be in the schools?

4 MR. LEGG: Objection to the extent this
5 goes beyond the scope.

6 THE WITNESS: If you're talking about
7 weapons detection that you walk through, yes.

8 BY MS. WEIANT:

9 Q. Yes.

10 Aside from the weapons detection
11 devices we've discussed, are there any other
12 measures in place to identify when the student
13 brings a weapon to school?

14 MR. LEGG: Object to the extent it goes
15 beyond the scope.

16 You may answer if you have personal
17 knowledge.

18 THE WITNESS: Do we at this time? No.
19 Other than the weapons detection, do we at this
20 time? No.

21 BY MS. WEIANT:

22 Q. So beyond weapons detection devices,
23 security cameras and searches in certain
24 circumstances, what other technology or devices
25 does Harford -- Harford County Public Schools use

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1 to identify threats?

2 MR. LEGG: Object again to the extent
3 it goes beyond the scope of this deposition.

4 To the extent you can answer
5 personally, you may go ahead.

6 MS. WEIANT: Counsel, just to clarify,
7 this is his fact witness portion of the
8 deposition --

9 MR. LEGG: I understand.

10 MS. WEIANT: -- correct?

11 MR. LEGG: Yeah. You're asking
12 questions on behalf of Harford County Public
13 Schools. So I'm just objecting to the extent that
14 you're asking him to seek testimony on behalf of
15 the school district rather than himself.

16 But you may answer.

17 THE WITNESS: I just need you to read
18 the question again.

19 BY MS. WEIANT:

20 Q. Yes, of course.

21 So beyond weapons detection devices,
22 security cameras and searches, are you aware of any
23 other technology or device that the schools use to
24 identify threats?

25 A. That we're currently using to identify

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1 threats, no.

2 Q. All of the safety and security
3 measures, including staffing and the various
4 technologies and devices we've discussed, require
5 funding, right?

6 A. Correct.

7 Q. Since you've joined Harford County
8 Public Schools, how has the safety and security
9 budget changed?

10 A. Safety has been increased in terms of
11 being able to cover the hiring of our school safe
12 liaisons as well as our regional security
13 coordinators, allocation of funding now for the
14 weapons detection systems and, you know, increased
15 line items to help procure more radios and cover
16 some more of the camera -- camera needs.

17 Q. Do you know how much the budget has
18 grown since you joined in 2018?

19 A. Without having it in front of me, no.

20 Q. Would you be able to estimate a
21 percentage amount of growth?

22 A. No.

23 Q. When the school is making the budget
24 every year, do you put in requests for new projects
25 or positions that you would like to fund?

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1 A. Yes.

2 Q. Have you ever been denied funds for
3 safety and security initiatives?

4 A. Yes.

5 Q. What initiatives have you been denied
6 funding for?

7 A. There have been a number of them.
8 Without having it in front of me, I can't -- I
9 don't -- wouldn't recall off the top of my head.

10 Q. Can you recall any specific things that
11 have -- you've been denied funding for?

12 A. No, I can't think of anything specific.

13 Q. Does your department receive any grant
14 funding?

15 A. Yes.

16 Q. How much of your budget would you say
17 is from grants?

18 A. I wouldn't know that information off
19 the top of my head.

20 Q. Who would?

21 A. Who would know it off the top of their
22 head? I don't know.

23 Q. Would you be able to find that
24 information?

25 A. Oh, I'll be able to find the

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1 information, yes.

2 Q. Is there one place where you could
3 identify all of that information, or would you have
4 to look at specific grant proposals?

5 A. I would have to look at, at least, at a
6 minimum, three places, because safety and security
7 touches other offices. There are other things that
8 are safety and security related but are not
9 necessarily managed by my office.

10 Q. You said you would have to look at
11 three things. What are those three things?

12 A. I said a minimum of three.

13 Q. Oh, a minimum.

14 A. So I would -- I would have to -- I
15 would have to get some information from
16 Mr. Hennigan's office, the threat assessment and
17 all of the things encapsulated in it, our safety
18 and security measures. That's not managed by my
19 office. I don't manage those teams. Those teams
20 are academic folks that are on the ground, inside
21 of the school.

22 So any funding that would go to that,
23 you know, I would have to collaborate, you know,
24 with that office.

25 I definitely would have to collaborate

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1 with the office of technology, because there's so
2 much that we do that is in collaboration with the
3 office of technology. And then our grants office
4 itself.

5 Q. Earlier, we discussed the Maryland Safe
6 to Learn Act, correct?

7 A. Yes.

8 Q. And that legislation requires active
9 shooter training, right?

10 A. It did. That law has changed.

11 Q. How has it changed?

12 A. So when that -- when that law was first
13 passed, the way we conducted our training, we
14 could, you know, freely do simulations as close to
15 real world as possible. But with most recent
16 legislation, there's been pretty much a 180 on how
17 those trainings should look, how they should be
18 conducted and things that are now expressly
19 prohibited.

20 Q. What things are now expressly
21 prohibited?

22 A. Loud noises, loud bangs, any simulation
23 of a weapon, any simulation of a person being
24 injured or harmed by a weapon, you know,
25 full-scale -- no full-scale drills with

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1 role-playing of someone being an assailant or
2 someone being a victim. None of those things were
3 precluded in the initial law, but they -- we -- we
4 can't do those things now.

5 Q. Do you have an understanding of why you
6 can't do those things anymore?

7 A. No, I don't really have an
8 understanding of -- I don't necessarily know of an
9 understanding of why. But I know that this became
10 a very divided issue on what's needed to prepare
11 students and staff and what's not needed, so...

12 I understand that there became this
13 divide where it was very polarizing in '18 where
14 everybody was saying. But I can't say I fully
15 understand it.

16 And the reason I can't fully understand
17 is because when these events around the country
18 occurred, the biggest question was: Why aren't you
19 doing more to protect my children? Why aren't you
20 doing more to protect, you know, our students? Why
21 aren't you doing more to protect our staff? What
22 more are you going to do? Those were the questions
23 in '18.

24 And so the legislature said, "Okay.
25 These are the things that we're going to do. We

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1 weren't doing this. This is what we're going to
2 do."

3 So we checked those boxes that the
4 community was asking, that the legislature --
5 because the legislators were even asking. And if
6 we -- if you don't do this, how come you don't do
7 this? If -- if students don't know how to respond
8 to this, why don't they know how to respond to
9 this?

10 So when you asked me, do I understand
11 why all of a sudden those questions aren't still
12 being asked, why we don't still want our students
13 prepared in the same way, why we don't want our
14 staff prepared in the same way as we wanted them
15 prepared in April of 2018, I don't fully understand
16 why that changed.

17 Q. When did it change?

18 A. Over the past couple of years, it
19 started changing when new legislation was coming
20 out that was changing the way that we approached
21 training and drills for our students. Though these
22 events have not changed, our approach to preparing
23 for them has definitely changed.

24 Q. And when you say "these events," what
25 are you referring to?

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1 A. I'm referring to escalating violent
2 events that still occur in schools.

3 Q. What would that include?

4 A. Excuse me. That would include events
5 where schools have still experienced violence, gun
6 violence.

7 Q. What did your critical response
8 training look like beginning in 2018?

9 A. Critical response training in 2018
10 looked like mainly lockdown. Like, we locked down
11 for everything. That's -- in 2018, critical
12 response, the way you responded to most critical
13 incidents was locking down. And really didn't
14 matter what it -- what it was; it was pretty much
15 lockdown.

16 That was one of the things that the
17 legislature was concerned about. That was one of
18 the questions. Why is that the only thing we know
19 how to do? Why don't we know how to do other
20 things? Those were the questions.

21 Q. And lockdown, is that also referred to
22 as shelter in place? Are they similar?

23 A. They're similar, yeah. Slight --
24 slight differences. I mean, if I --

25 Q. Slight differences?

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1 A. Yeah. If I got a hurricane outside, I
2 might want to shelter in place, but I might not
3 want to lock people out who are trying to get
4 inside the building.

5 If I got a shooter outside, I'm
6 sheltering in place, but I also don't want anybody
7 getting in the building because I don't know if
8 you're the assailant. So there are some slight
9 nuances.

10 Q. Did that change in -- sorry. Strike
11 that.

12 Did the critical response training
13 change in 2019?

14 A. Critical response training had some
15 additions to it after the Maryland Safe to Learn
16 Act.

17 Q. What were those additions?

18 A. Well, the active shooter training.

19 Q. And what did the active shooter
20 training look like?

21 A. Our active shooter training looked like
22 about an hour and a half -- like 90 minutes of
23 presentation and then in preparation for practical
24 exercises.

25 And our training -- I mean, we had --

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1 we had Nerf guns. We had -- you know, we had
2 vests. You know, we had simulation equipment. We
3 collaborated with our law enforcement partners.

4 And we -- after we did our presentation
5 portion, we broke down, and we put our staff
6 members in situations that would allow them to
7 understand response mechanisms and options. It
8 was -- it was really rooted in options.

9 Because when all you've done in a
10 school system -- not just our school system. When
11 all you've done since the '70s is this thing called
12 "lockdown," that doesn't necessarily give way to
13 options. And that was one of the biggest questions
14 that the community and the legislator asked, "How
15 come our folks don't have options?" And so our
16 training was options-based.

17 Q. And to clarify what you just described,
18 that training was for staff and teachers?

19 A. The initial training is for staff and
20 teachers and to be able to conduct drills with our
21 students.

22 Q. And what do the student drills look
23 like?

24 A. So our student drills were scaled down
25 some. More of a talk-through, walk-through type of

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1 situation. We didn't use Nerf -- so we didn't use
2 Nerf guns. We didn't use any of those type of
3 equipment or apparatus with our students.

4 However, we did go through the
5 continuum of optional response. Like, you do have
6 the option to run if you hear gunfire on the west
7 side of the building and you're on the east side.

8 You do have the option to not wait for
9 the gunman to get to the west side of the building
10 from the east side. You have an option to run and
11 evacuate.

12 You do have the option other than just,
13 yeah, lock the door, but you've got an option if
14 you've got file cabinets and desks and whatever
15 else you can pile, and explaining the mindset
16 behind that, explaining the mindset based on data,
17 that people who commit these offenses want to do
18 the most amount of damage in the shortest period of
19 time. They're not going to spend five minutes
20 trying to get through a door that you barricaded.

21 But if nobody's ever talked to you
22 about that, nobody ever shown you what that looks
23 like, then you don't necessarily think about that.
24 You don't necessarily develop that motor memory or
25 sensory skill when these things happen.

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1 And then, ultimately, to talk about the
2 option of fighting back. You don't just have to be
3 a willing participant in your own demise. So
4 that's what those things look like.

5 Q. Can you give examples of how you help
6 students develop sensory skills that would allow
7 them to respond to an active shooter situation?

8 A. More of motor -- more of a motor
9 skills. Showing them, from their classroom, exits,
10 you know, exit areas or whatever. And not just for
11 a fire drill, right? Because you do these fire
12 drills or whatever, we're pretty much taking, you
13 know, kids to the nearest exit/entry or whatever.

14 Getting students in the mindset, again,
15 of following instruction, taking direction when you
16 get a critical life-threatening event where there's
17 someone trying to create harm by violence.

18 And so just practicing and training
19 what that response looks like as opposed to having
20 a situation in the aftermath and saying, "Oh, I
21 never knew I could do that." "I never knew that
22 exit was right there." "Nobody ever walked us
23 through here." "Nobody ever told me if I hit the
24 corner of a window, even on a 21st century
25 building, that I can spiderweb that window instead

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1 of throwing a chair in the middle of it and
2 wondering why the chair keeps bouncing back."

3 So if you don't -- if no one tells you
4 these things, then you don't know these things.
5 And so that's what we worked on training our
6 students on.

7 Q. Is one of your goals in these student
8 drills to help students understand how serious the
9 situation could be?

10 A. Yes.

11 Q. How do you do that?

12 A. Well, in terms of showing them how
13 serious the situation can be, the biggest thing
14 we're teaching them is the preservation of -- of
15 life, you know, of their own life when we start to
16 talk about these specific drills.

17 We see these drills -- or we saw these
18 drills as having been meant to help our students
19 understand that these can be life-saving measures.

20 But I think it's also important to note
21 that we've also let our staff and our students know
22 that these are transferable skills. So it doesn't
23 matter. If you're with your parents somewhere and
24 something like this happens, you can utilize these
25 same skills. You can utilize this thinking.

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1 And so we also help them by letting
2 them know that it's not just response. It's also
3 about thinking. It's not just about immediately
4 reacting or responding, but it's always -- it's
5 also about thinking your way through the situation.

6 Q. So when you were doing drills, what did
7 a full talk-through, walk-through drill look like
8 with students?

9 A. So if we -- at a particular school, if
10 the active assailant drill -- well, first of all, I
11 didn't -- the state said active shooter. When I
12 wrote the program, I decided to call it "active
13 assailant," because not every assailant has a gun
14 that can do damage.

15 So in our active assailant drills, we
16 would determine whether or not we were going to do
17 a run, hide or fight portion of that drill based on
18 that particular classroom.

19 And so let's just say it was a
20 barricade situation. What we did is we talked
21 through. We didn't necessarily have our students
22 take desks or whatever.

23 So to really tell you what it looks
24 like, if everyone here were students and I was the
25 teacher, I would say, "Can you point out three

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1 things that you would use to block that door if we
2 knew somebody was down the hallway and making their
3 way down here?" And then the teacher can shut it
4 down, and students can start talking.

5 Me and Mike would grab your desk,
6 Ms. Jones, because it's the heaviest, and we will
7 push it in front of the door. That projector cart
8 right there, we'll try to put it on top of the
9 desk. We would make sure we get out of the sight
10 of the window if -- if it has a window, you know.
11 And they would talk through it.

12 When it comes to the evacuation piece,
13 we actually would walk out into the hallway and
14 talk about what that evacuation would look like
15 from that particular classroom.

16 If it was the last resort of having to
17 defend -- fight and defend your life, then, again,
18 the teacher would say, "I want you all to think
19 about, when you look around this classroom, what
20 are some things that we might be able to use to
21 neutralize and defend ourselves from someone if
22 they were to breach the barricade we put up, if
23 they were to get in. What are some things that we
24 would do?" you know.

25 You know, me and John Doe would stand,

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1 you know, next to the door with, you know, a chair.
2 We'd be prepared to throw the stapler. We'd be
3 prepared to throw things at -- and this is what we
4 were training the students.

5 So that's what our drills looked like.
6 Did we have a kid throw, you know, a stapler at the
7 door? No. Did we get up and move stuff physically
8 in front of the door? No.

9 We -- we decided to take the route of
10 talking these things through with our students and
11 having them paint pictures in their mind of what it
12 would look like if they were confronted with these
13 situations.

14 Q. You mentioned that there might be a
15 run, hide or fight portion of these drills. In any
16 given drill, would you cover all three of those
17 options?

18 A. Typically, no. We wouldn't -- we would
19 just do -- we would pick a time to really focus on
20 one and then do another one at another time.
21 Although, schools were not prohibited from touching
22 on all three if a teacher wanted to touch on all
23 three of those things.

24 Q. How often would students participate in
25 these drills?

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1 A. When we first started, at least once,
2 maybe twice a year they would participate in those
3 drills.

4 Q. After the laws changed, did you
5 continue to do any type of active assailant drills
6 with students?

7 A. Instruction.

8 Q. What does that look like?

9 A. Just talking about what the response
10 would look like if someone comes in, but pointing
11 stuff out and all that --

12 Anything that could, I don't know,
13 incite or invoke -- evoke some type of emotional
14 type of response, with actually describing or what
15 does it look like, somebody is coming through the
16 door with a gun and all that, got away from -- from
17 that stuff. Because the law pretty much says you
18 really can't go into all that type of stuff,
19 anything that might be considered creating trauma
20 to a student.

21 So now we can do an evacuation drill
22 like -- because you can evacuate for any number of
23 reasons. And we can cite that as a part of our
24 evacuation drill, that our students would know how
25 to evacuate in the case of an active assailant.

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1 We can still do lockdown drills. We
2 don't have to give a reason. We can just say,
3 "Hey, if we get the notice from the office that
4 we're going into lockdown, this is what lockdown
5 means. We're going to lock the door. We're going
6 to shut off the lights. We're not going to leave
7 out until we're given the clear."

8 Well, we don't necessarily have to say
9 that was for because it's an active -- as I say, it
10 could be for any reason. It could be for a medical
11 emergency. And we've got emergency services people
12 coming in. We don't want anybody in the hallway.

13 So we go in and say we're in a lockdown
14 because we've got, you know, somebody that just had
15 a medical emergency, and we're going to have some
16 emergency apparatus moving through the hallways.
17 And we don't need anybody out here, so we're locked
18 down until further notice.

19 So when we do a lockdown drill now, we
20 don't specifically have to put the reason. We just
21 need to know our kids know how to do a lockdown
22 drill.

23 (BROOKS EXHIBIT 2, News article dated
24 1/8/19 titled Harford Schools Include Mental Health
25 Component in Active Assailant Training, was marked

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1 for identification.)

2 BY MS. WEIANT:

3 Q. I'm going to show you what has been
4 marked Brooks Exhibit 2.

5 MS. WEIANT: This is Tab 13.

6 BY MS. WEIANT:

7 Q. Go ahead and take a moment to review
8 this document.

9 Have you had time to review?

10 A. Yes.

11 Q. So this is a news article dated
12 January 8th, 2019, titled "Harford Schools Include
13 Mental Health Component in Active Assailant
14 Training." Do you see that?

15 A. Yes.

16 Q. Are you familiar with this article?

17 A. Yes.

18 Q. Did you provide comments for this
19 article?

20 A. Yes.

21 Q. And this -- in 2019, Harford County
22 Public Schools was still doing active assailant
23 drills with their students, right?

24 A. In 2019?

25 Q. Yes.

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1 A. Yes.

2 Q. Can you turn to the second page, the
3 first full paragraph --

4 A. I'm sorry. I'm sorry. Say that again.

5 Q. The first full paragraph.

6 A. Okay. Where it starts with "reunify"?

7 Q. No. So it's the one right below that.
8 Sorry. It says: Some students and adults.

9 A. Uh-huh.

10 Q. So, some students and adults,
11 especially those who suffer from anxiety, could
12 have reactions to the training, and Board Vice
13 President Laura Runy -- Runyeon asked how trainers
14 would handle that.

15 The first part there, "Some students
16 and adults, especially those who suffer from
17 anxiety, could have reactions to the training" --

18 A. Uh-huh.

19 Q. -- do you agree with that?

20 A. Yes.

21 Q. A few lines down, there's a quote that
22 says: Students and even adults who take the
23 training are impacted by it, he said. Past trauma
24 could impact how people receive training.

25 A. Uh-huh.

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1 Q. Is that your view?

2 A. Yes.

3 Q. Do you believe that students and adults
4 might be impacted by the training?

5 A. Yes.

6 Q. And that people who have experienced
7 trauma in their past might be impacted more
8 heavily?

9 A. I don't know about more heavily, but
10 they could be, depending on what that trauma is.
11 But, yeah, it could be.

12 Q. But -- so -- sorry. Strike that.
13 Experiencing past trauma could change
14 the way that you experience the training?

15 A. Yes. Could change the way you receive
16 it, yeah.

17 Q. Was it your understanding that these
18 drills might be traumatic for students?

19 A. No, not our drills. No. Not the way
20 we conducted ours.

21 Q. But it was your understanding that they
22 might -- it might -- they might cause anxiety?

23 A. Yes.

24 Q. They might cause stress?

25 A. Well, yeah, I guess they could,

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1 depending on the -- the child. But, yes, it could
2 cause stress.

3 Q. But you believed it was still important
4 to do it?

5 A. Yes.

6 Q. Why?

7 A. Because it's what our community asked
8 for. And it is -- it's also a part of the changing
9 landscape of our society when we started looking at
10 the increase in these incidents.

11 So either you're going to be -- you're
12 going to take steps to be prepared and prepare your
13 people to be able to respond, or you just don't
14 prepare and you don't take steps.

15 Q. You believe that helping students and
16 teachers prepare might ultimately save their life,
17 right?

18 A. Might ultimately, yes.

19 Q. You can set that document aside.

20 MS. WEIANT: Let's take a quick break.

21 MR. LEGG: How long do you want?

22 MS. WEIANT: Five minutes?

23 MR. LEGG: Cool.

24 THE VIDEOGRAPHER: We are now going off
25 the record at 1:15 p.m.

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* * *

(Whereupon, there was a recess in the proceedings from 1:15 p.m. to 1:38 p.m.)

* * *

THE VIDEOGRAPHER: We are now going back on the record at 1:38 p.m.

BY MS. WEIANT:

Q. As supervisor of safety and security, what types of threats or incidents do you -- are you responsible for? Strike that.

As supervisor of safety and security, what types of threats or incidents does your team respond to?

A. Excuse me. A wide variety of threats and incidents. My team responds to threats of -- all threats of violence we're going to, you know, be involved in, sometimes threats -- threats of self-harm. But pretty much any type of threat to the safety, security and well-being of our students and staff, we're going to respond to those threats.

Q. Does that include things like fires or natural disasters?

A. Yes.

Q. It includes fights?

A. Yes.

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1 Q. Does it include abuse?

2 A. The threat of abuse? Because you asked
3 me about threats. Are you talking about somebody
4 threatening to abuse somebody?

5 Q. So -- either incidents or threats,
6 would you respond to reports of abuse or threats of
7 abuse?

8 Let's start with reports. Would your
9 team respond to reports of abuse involving
10 students?

11 A. In some cases, yes, because it might be
12 reported -- they might be the first person it's
13 reported to.

14 Q. What types of incidents have you seen
15 involving abuse?

16 A. I can't recall off the top of my head.

17 Q. Would it include abuse occurring
18 outside of school?

19 A. If it's reported to -- to one of our
20 people.

21 Q. And how would you respond to a report
22 of abuse outside of school?

23 A. Determine what -- what the elements of
24 the report is. So, I mean, we're going to notify
25 any other respective parties that should be

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1 involved. It just depends on what type of abuse it
2 is.

3 Q. Could it include reports of domestic
4 abuse?

5 A. If it's reported to us, yeah, we're
6 going to report it.

7 Q. Could it include reports of sexual
8 abuse and assault?

9 A. Yes.

10 Q. Are you aware of any incidents
11 involving sexual abuse and assault that have been
12 reported to you or your team?

13 A. Not specifically. I mean, no.

14 Q. Would you or your team respond to
15 incidents involving human trafficking?

16 A. When you say "respond," I need you to
17 explain what you mean by "respond."

18 Q. If someone reports a violent incident
19 or activity, abuse, any of these things that we've
20 discussed --

21 A. Uh-huh.

22 Q. -- what does your team do with that
23 information?

24 A. We'll make notifications to law -- if
25 it's abuse involved in those type of situations,

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1 we're immediately getting law enforcement involved,
2 immediately.

3 Q. Okay. So one response would be passing
4 that information along to law enforcement?

5 A. No, that's going to be a response. If
6 it's the things that you outline, we're calling law
7 enforcement.

8 Q. So one response includes sharing
9 information. Who else would you share information
10 with once you receive a report?

11 A. It just depends on what it is. Not
12 everybody is on the same notification list for
13 different incidents. But it just depends on what
14 it is.

15 I mean, if it's something of a sexual
16 nature involving our -- our student, or you say
17 sexual abuse or something like that or human
18 trafficking, then, yeah, we're going to notify law
19 enforcement. Because now you're talking about, you
20 know, something that's illegal, against the law.
21 But then if it's involving our student, we've got
22 to notify people because we've got to be able to
23 support the student.

24 So, you know, we're going to be
25 notifying some folks from Mr. Hennigan's office,

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1 you know, so that they are aware.

2 And then to a lesser extent, if it --
3 if it involves harassment type of stuff, then we're
4 going to notify our person that handles our
5 Title -- Title IX complaints. We're going to
6 notify them.

7 But everything is on a case-by-case,
8 but we're going to make notifications.

9 Q. What types of incidents would you
10 respond to in person or send somebody to respond to
11 in person?

12 A. I don't understand what you mean. What
13 type of incidents? I don't -- I mean, that's so
14 broad.

15 Q. If there is a fight at school --

16 A. Uh-huh.

17 Q. -- would you or one of your school
18 safety liaisons go to the location where that fight
19 happened to intervene in any way?

20 A. That's on a case-by-case basis. If two
21 eight-year-olds get into a fight in a cafeteria in
22 a school that doesn't have a school safe liaison,
23 I'm not calling the school safe liaison to go over
24 there to do anything about those two
25 eight-year-olds who fought in the cafeteria. I'm

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1 going to let the school administrator and the
2 teachers mediate that situation.

3 If there's no school safe liaison
4 assigned there, I'm not sending my regional there
5 because those two students fought. We don't have
6 the -- the manpower. Fights happen every single
7 day across the school district.

8 So we wouldn't necessarily send them to
9 every single situation in the event of a fight.

10 Q. Okay. So help me understand a little
11 bit. If you get a report of some kind of violent
12 incident or threat of violence, what is your team's
13 primary responsibility with that information?

14 A. To triage it, to see whether or not it
15 needs to go to, one, law enforcement; and then,
16 two, when we triage that report of violence that we
17 receive, determine what other notifications should
18 be made and to determine whether or not we need to
19 respond to the location. But we do all that
20 through triaging of the information when we get it.

21 Q. Okay. Do you generate any reports
22 about specific incidents or threats?

23 A. Do I generate any? I generate -- for
24 major critical incidents, I will generate a
25 after-action report if it falls under the matrix

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1 requirement for the Maryland Center for School
2 Safety.

3 Q. You've mentioned threat assessments
4 earlier.

5 A. Uh-huh.

6 Q. Is that something that you and your
7 team are responsible for?

8 A. No.

9 Q. Are there any other documents or forms
10 that are primarily your team's responsibility to
11 complete?

12 A. No.

13 Q. How do you track -- sorry. Strike
14 that.

15 Do you track every violent incident or
16 threat that you learn about?

17 A. Every violent incident or threat that
18 we learn about? Yeah, those are -- if we learn
19 about it, yeah, because, I mean, that information
20 has been distributed. So, yeah, we -- we're able
21 to track that.

22 Q. Do you have a system for tracking it?

23 A. We have a communication process we
24 track it. And that's our SOS. So if something
25 violent or a threat comes out, I'll receive that

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1 information from my SOS.

2 Q. Do you draft and send out the SOS, or
3 do you receive them?

4 A. I receive them.

5 Q. If I wanted to know how many fights
6 occurred at a specific school in a given year, how
7 would I find that information?

8 A. I don't know.

9 Q. If I wanted to know what caused those
10 fights at a given school in a given year, how would
11 I find that information?

12 A. That could be in -- well, if you're
13 asking about every single fight, I don't know. But
14 for fights that are documented, you can get that
15 information based on a number of ways, I would
16 imagine. We don't deal with that.

17 But student disciplinary record if any
18 sanctions were doled out. If threats were made,
19 then, of course, there would be an assessment. You
20 could capture some of that information through
21 threat assessments.

22 And if a police report was written, you
23 can capture it through -- if there's an assault
24 that created a police report, you can capture that
25 information as to why.

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1 Q. So the documents you just mentioned, a
2 threat assessment, disciplinary reports and
3 potentially a police report, none of those are
4 documents that you are responsible for drafting,
5 are they?

6 A. No.

7 Q. Do you receive every threat assessment,
8 disciplinary report or police report that is
9 created?

10 A. No.

11 Q. Would you have access to every threat
12 assessment, disciplinary report or police report?

13 A. No.

14 Q. How do you keep track of the
15 circumstances surrounding any particular violent
16 incident at Harford County Public Schools?

17 MR. LEGG: Objection to form.

18 THE WITNESS: How do I keep track of
19 any violent incident?

20 BY MS. WEIANT:

21 Q. So if you wanted to go back and look up
22 what happened in a given fight --

23 A. Uh-huh.

24 Q. -- where would you look?

25 A. A fight that occurred inside of a

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1 school building?

2 Q. Yes.

3 A. I would -- if I wanted to know
4 background information, if it was captured, then I
5 would talk to the administrator of the school.

6 Q. So we talked about various threats or
7 safety threat -- safety and security threats,
8 including natural disasters, violence on school
9 property, threats of violence, potentially abuse,
10 human trafficking. Do you ever receive reports of
11 gang activity at Harford County Public Schools?

12 A. Yes.

13 Q. How often would you say you've received
14 reports of gang activity?

15 A. I don't have the measurement of the
16 frequency that I receive that information.

17 Q. In a given school year, how many times
18 would you say you receive information about gang
19 activity at schools?

20 A. I don't have that measurement.

21 Q. Are you aware that some Harford County
22 Public School students are members of gangs?

23 A. Yes.

24 Q. Do you track student gang activity in
25 any way?

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1 A. No.

2 Q. Would you agree that the risk of
3 violence is much -- sorry. Strike that.

4 Do you agree that the risk of violence
5 increases in situations involving gang activity?

6 MR. LEGG: Objection to form and
7 foundation.

8 THE WITNESS: Does the risk of violence
9 increase based on gang activity?

10 BY MS. WEIANT:

11 Q. Yes. So would you agree that the risk
12 of violence increases --

13 MR. LEGG: Same --

14 BY MS. WEIANT:

15 Q. -- in situations involving gang
16 activity?

17 MR. LEGG: Same objection.

18 THE WITNESS: Yes.

19 BY MS. WEIANT:

20 Q. Would you agree that the risk of gun
21 violence increases in situations involving gang
22 activity?

23 MR. LEGG: Objection to form and
24 foundation.

25 THE WITNESS: Yes.

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1 BY MS. WEIANT:

2 Q. In your 20-plus years in school safety
3 and in law enforcement, have you encountered a lot
4 of gang activity in your career?

5 A. No.

6 Q. You said that you are aware that some
7 Harford County Public School students are members
8 of gangs. How did you learn that information?

9 A. The times I've learned that
10 information, I've learned it through law
11 enforcement partners sharing validated -- using
12 their validation process, students who were
13 validated as being gang members.

14 I don't know what their process is, but
15 they've shared that this particular individual we
16 validated. But they've never shared with me their
17 whole process they go through to do that
18 validation.

19 (BROOKS EXHIBIT 3, Emails, top one
20 dated 10/30/18, Subject: Gang member placements,
21 Bates HCPS_00226861-62, was marked for
22 identification.)

23 BY MS. WEIANT:

24 Q. I'm going to show you what has been
25 marked as Brooks Exhibit 3.

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1 MS. WEIANT: This is Tab 33.

2 BY MS. WEIANT:

3 Q. There's a printing error. The version
4 you have does not have the Bates stamp. I will
5 represent to you that the Bates stamp on this
6 document is HCPS_00226861 through HCPS_00226862.
7 Go ahead and take a moment to look at that
8 document.

9 So in the first email in this thread,
10 which is the back -- the second page of the
11 document, it's an email from Buzz Williams, dated
12 October 26, 2018, to Bernard Hennigan, copying you.

13 And it starts: Buck, Erica and I
14 discussed the risks associated with placing known
15 gang members in the -- the day school at Alt Ed.

16 Do you see that?

17 A. Yes.

18 Q. Do you know what the day school at
19 Alt Ed is?

20 A. Yes.

21 Q. What is that?

22 A. It's a alternative education setting
23 for students who -- who have been placed there
24 either temporarily or long term.

25 Q. What do you mean by an "alternative

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1 education setting"?

2 A. It is not necessarily their
3 comprehensive educational environment at the school
4 that they are zoned to attend.

5 Q. And why might they be placed in
6 alternative education settings?

7 A. Oh, wow. I don't really get involved
8 in that. So I don't know all the reasons that Ed
9 services or suspension services were placed in
10 there. But I imagine there's a number of different
11 reasons, not the least of which is students request
12 to go there sometimes.

13 Q. In the next paragraph, Buzz writes:
14 Unless I am directed otherwise, for the foreseeable
15 future, known gang members with violent histories
16 who received extended suspensions or expulsions
17 will be placed online for the duration of their
18 removals.

19 Do you see that?

20 A. Yes.

21 Q. Did you have any involvement with that
22 decision?

23 A. No.

24 Q. Were you -- strike that.

25 The next paragraph says: I'm hoping

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1 that Donovan may have some ideas about a gang
2 intervention to get increased commitment to truce
3 while in school.

4 Do you see that?

5 A. Yes.

6 Q. Do you know what this is referring to?

7 A. Yeah. I think it's referring to, like,
8 trying to figure out how we can get the people who
9 have been identified as gang members to really not
10 engage in those activities in or on school grounds.

11 Q. Do you remember Mr. Williams asking you
12 for ideas about a gang intervention strategy?

13 A. Yeah, I do.

14 Q. What became of that request?

15 A. I talked to -- I talked to a former
16 commander in Baltimore City, Rick Hite, after
17 this -- I pretty -- I pretty distinctively remember
18 it. Because I remember when I was in Baltimore
19 City School Police, he was part of this program
20 called "Get Out of the Game." "Get Out of the
21 Game."

22 So I reached out to him at the time he
23 was the chief of police in Indiana and just told
24 him I just got here to Harford County, and, you
25 know, I was now experiencing, you know, stuff that

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1 I hadn't previously experienced with being involved
2 with trying to find solutions.

3 And he was a busy guy, so he never
4 really followed up. He gave me a lot of
5 information on Get Out of the Game. We had a
6 conversation, but it was nothing that was useful to
7 me after we got off the -- the phone. And I had no
8 background or expertise on mitigating conflict
9 between gang members.

10 Q. Do you know if you responded to this
11 email?

12 A. I don't recall. I may have -- I may
13 have -- I -- I know there were follow-up in-person
14 conversations because I know I went around to
15 Buzz Williams' office, and we kind of had
16 conversations about some of these students.

17 Q. Do you recall any of those
18 conversations?

19 A. Yeah. A few of those conversations, I
20 really needed him to kind of explain to me what it
21 was that, you know, Harford County had been
22 experiencing with some of this stuff. Because even
23 though I was coming from Baltimore City, again, I
24 wasn't involved in, you know, some of the stuff
25 that I was seeing in the few short months that I

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1 had come here.

2 So he kind of had to brush me up on,
3 you know, what exactly all this stuff meant in
4 here. Clearly, they didn't know if I had any ideas
5 since they said I was hoping that I might be able
6 to come up with some. But that just wasn't my
7 background.

8 Q. So you mentioned some of the stuff that
9 you were seeing when you came to Harford County
10 Public Schools. What do you mean by that?

11 A. These -- this type of, you know, email
12 stuff with these -- these young folks were getting
13 into conflicts in the community and then some of
14 that stuff spilling over when it got to school with
15 fights taking place.

16 Q. Do you mean fights generally, or are
17 you talking specifically about students who have
18 involvement with gangs?

19 A. Yeah, oppositional. Students who are
20 oppositional, belonging to one side or the other of
21 the gang.

22 Q. Do you know how many different gangs
23 are active amongst the students at Harford County
24 Public Schools?

25 A. I don't.

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1 Q. Do you know the types of gangs that are
2 active amongst students at Harford County Public
3 Schools?

4 A. I'm going to be -- from my -- I know
5 that I was dealing with this a lot more before
6 COVID. The gang stuff was very much more pervasive
7 in terms of conversations that I was being included
8 in.

9 After COVID, I'm not -- I have not
10 received a lot of -- I have not had a lot of
11 conversations after COVID at the level about gangs
12 that was happening pre-COVID. And pre-COVID, it
13 was a huge learning curve for me.

14 After we went into that lockdown,
15 schools were totally locked down, society was
16 locked down. When we came back, some of these
17 students aged out; they graduated. So...

18 Q. And in the top email on this -- on the
19 first page, Erica Harris responds. Who is Erica
20 Harris?

21 A. So Erica Harris, when I first arrived
22 in the district, she was the principal at the
23 alternative ed school.

24 Q. Okay.

25 A. So she was probably my expert, really,

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1 to be honest, even regarding the information that
2 Buzz gave me. I think Erica was giving me more of
3 a lesson than anybody. Because as the principal at
4 that school, she -- she was the one receiving
5 students. So she was really giving me an
6 education.

7 Q. What kind of lesson or education was
8 she giving you?

9 A. About the particular students involved
10 in the gangs. Like, she gave me background of some
11 of these students belonging to families where she
12 had the fathers as students in high school, and the
13 fathers now have 14- to 15-year-old sons who were
14 students. So that type of background, trying to
15 help me understand, you know, 80 East.

16 But I guess the -- the question that
17 was never really answered for me is, if these kids
18 grew up playing in rec ball leagues and little
19 leagues, and you got pictures of these kids when
20 they were on the same baseball team, where was the
21 intersection when they turned 15 and 16 and all of
22 a sudden they don't like each other, or their --
23 one kid's --

24 Like, that's the stuff Erica would give
25 me. Like, oh, yeah, believe it or not, when they

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1 were 12, look at this picture. This -- he
2 worked -- he played for his father. They were both
3 on the same baseball team.

4 So I'm -- I'm trying to figure out,
5 well, where do we reach this impasse where now
6 they're 16 and they've chosen sides and they're
7 fighting each other?

8 So that's the kind of stuff that Erica
9 would give me, because I didn't understand the
10 dynamics of that.

11 Q. And what insight did she provide on how
12 that happened?

13 A. I don't know if she ever -- I don't
14 know if she knows how that particularly happened
15 except for, you know, these students getting
16 involved in a culture, I guess.

17 Q. And in the first -- in her email, when
18 she responds, she copies you, and she says:
19 Currently, we have two nights of twilight school
20 for online students.

21 Do you know what twilight school is?

22 A. Yeah. I think twilight school, like,
23 starts after 5:00 up until like maybe like 8:00 or
24 something like that.

25 Q. Okay. She continues: On those

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1 evenings, students separated in the following ways:
2 1), Different gangs on different nights, currently
3 400 Savage and KBE (both Bloods) are on Tuesday,
4 and Thug Entertainment, 80 East and Problem Kids
5 (Crips) are on Thursday nights.

6 Do you see that?

7 A. Yes.

8 Q. Were you familiar with any of these
9 gangs being active -- sorry. Strike that.

10 Were you familiar with these gangs
11 prior to receiving this email?

12 A. Yes.

13 Q. Had you -- were you aware of their
14 activity on -- strike that.

15 Were you aware that they were active at
16 Harford County Public Schools?

17 A. No.

18 Q. She goes on: Number 2, For greater
19 separation, we will be opining -- I believe it's
20 supposed to be "opening" -- Wednesday nights in
21 November.

22 And Number 3, she says: The students
23 are placed in several different rooms, including
24 two with cameras that allow us to more closely
25 monitor behaviors and safety provisions.

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1 Do you see that?

2 A. Yes.

3 Q. Why might you put them in different
4 rooms with cameras to allow you to more closely
5 monitor behaviors and safety?

6 A. I don't know. You're talking about why
7 did she write that?

8 Q. More generally, why might you put these
9 students in different rooms and use cameras to
10 monitor their behaviors?

11 A. I don't know what the rationale was
12 behind that.

13 Q. You don't know why you might want to
14 separate members of competing gangs when placed in
15 the same room or in the same vicinity?

16 A. With cameras and all that other stuff?
17 No. I mean, to be honest, no. I -- again, this
18 was not my -- even coming from Baltimore City, this
19 was not my background. This was a huge learning
20 curve for about the first 18 months I was here to
21 really kind of understand this whole gang dynamic.

22 Q. Did it surprise you?

23 A. It did.

24 Q. So going back to the first email where
25 Buzz asks: I'm hoping that Donovan may have some

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1 ideas about a gang intervention.

2 Did you ever implement a gang
3 intervention --

4 A. No.

5 Q. -- as discussed here?

6 A. No.

7 Q. Has there been much follow-up on that
8 since?

9 A. No, because our law enforcement
10 partners really started to make a lot of arrests in
11 the community. And since that time -- like, these
12 emails were probably a lot more frequent than we're
13 going to find emails like that over the past at
14 least two years.

15 Q. In your experience, does law
16 enforcement usually notify you if they learn of a
17 Harford County Public School student that is
18 involved in gang activity?

19 A. If they are charged with a reportable
20 offense.

21 Q. What's a reportable offense?

22 A. So the Maryland -- Maryland law
23 requires that if a student is arrested in the
24 community for a number of enumerated crimes that
25 fall under a category, that they have to notify the

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1 school system that they made the arrest of the
2 student because it's a reportable offense, meaning
3 an offense that needs to be reported to the school
4 to let us know that this person was involved in a
5 carjacking Saturday night, and Baltimore County --
6 and was arrested by Baltimore County police.

7 That's a reportable offense, so that
8 they would notify us and let us know that. Are
9 they going to say, "And they were also a member of
10 the Blood gangs"? Not necessarily. That may not
11 come up when they get arrested.

12 Q. And if there was no reportable
13 offense -- let's say law enforcement has --
14 separately, without any incident, has intelligence
15 or a reason to believe that a student is involved
16 in gang activity. Would they report that to you or
17 inform you of that?

18 A. They may inform me of it. It depends.
19 If they -- if they have an investigation going on
20 related to something else, they may not inform me
21 of it.

22 Q. Have you ever received information like
23 that from law enforcement where there was no
24 reportable offense?

25 A. Like what? Specifically, what are you

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1 asking me?

2 Q. Has law enforcement ever informed you
3 of a student's involvement in gang activity
4 separate from a reportable offense?

5 A. Yeah. When I first got here, yeah.
6 The first couple years I was here, yeah. Once they
7 realized I didn't have a clue, yeah, they started
8 trying to build my capacity, understanding.

9 Q. Has there been any effort to coordinate
10 more closely with law enforcement to identify
11 students who might be involved in gang activity?

12 A. Since -- again, since COVID, I would
13 have to say, no, we haven't -- we haven't been
14 working or talking or having conversations about
15 working more closely to identify gang members.
16 Prior to that, yes, absolutely.

17 Q. What conversations were you having
18 prior to COVID about?

19 A. The groups that Ms. -- Ms. Harris
20 listed in here, because there was -- you know, we
21 were just constantly having, like, fights. I was
22 constantly trying to figure out who was with who.

23 Because then you would have small --
24 smaller groups that would name themselves. You
25 know, they come up with some name, and they would

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1 start off with four or five of these kids. And
2 then you would have to determine, okay, you just
3 came up with the -- you know, I don't know -- the
4 Captain Crunch Group. Who are they associated
5 with? Are they -- are they Bloods? Are they
6 Crips?

7 Then you would try to further dissect.
8 Or are they just like some independent group of
9 kids that just decided they're going to organize
10 what they -- what they call "a gang"? So a lot
11 more information was shared during that time
12 period.

13 Q. Earlier, you testified that there would
14 be -- there might be a higher risk of violence,
15 including gun violence, in situations involving
16 gang activity. Do you recall that?

17 A. Yes.

18 Q. Are you aware of situations involving
19 violence, including gun violence, where the
20 students involved were members of gangs?

21 A. Yes.

22 Q. Can you tell me about those incidents?

23 A. Yeah. We had -- yeah. Unfortunately,
24 we lost a student -- I think it was 20 -- 2022,
25 4th of July -- I think it was the 4th of

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1 July weekend.

2 There was cookout out in the community.
3 And a student who was alleged to have been -- I
4 think he was alleged to have been a member of the
5 Crip gang, was at a cookout in the community on
6 that Saturday night. And some other members were
7 in the community, drove through, saw him or
8 something and double back and came back and shot at
9 him, and he was shot and killed.

10 Q. Were you involved in that -- in
11 responding to that incident at all in your job at
12 Harford County Public Schools?

13 A. I was involved in trying to determine
14 whether or not any of that was going to filter back
15 into the school building; whether or not there was
16 any connection to what had happened, the people who
17 were involved; whether or not, you know, we needed
18 to, you know, prepare for any of that to come back
19 into the school building.

20 Q. Why might you need to prepare for some
21 of that to come back into the school building?

22 A. Because when you lose students out in
23 the -- in the community like that and students are
24 grieving, it has an impact. Students will be on
25 edge. Say, a student that might ordinarily not be

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1 aggressive or agitated easily, at the loss of, you
2 know, a friend or whatever, could be very easily
3 agitated.

4 So we just want to make sure we have
5 people and resources in places to be able to
6 address the -- the range of emotions that we might
7 deal with our students coming back into the
8 building.

9 Q. So you agree that -- sorry. Strike
10 that.

11 A student who is grieving in the wake
12 of a loss might be more agitated than they
13 ordinarily would?

14 A. Yes.

15 Q. Have you encountered other students who
16 have suffered from grief or loss in their time at
17 Harford County Public Schools?

18 A. Have I encountered them?

19 Q. Yes.

20 A. I haven't encountered them personally,
21 no. But I know that we've sent teams out to be
22 able to address that. Have I sat down and talked
23 to any of them? No.

24 Q. You -- what teams have you sent out to
25 address that?

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1 A. The district? I think the district
2 sends out, like, grieving and counseling teams.
3 That's not from my office, though.

4 Q. Are you aware of other situations where
5 the Harford County Public School community has lost
6 students?

7 A. Yes.

8 Q. How many?

9 A. I don't know how many.

10 Q. Can you tell me about those --

11 A. Yeah. We --

12 Q. -- situations?

13 A. Yeah. We lost a kid that was -- we
14 lost a kid who was in the car with his mom, and a
15 tractor-trailer driver -- I don't know what
16 happened, but it was a very bad accident. We lost
17 that kid.

18 We also lost a guy who owns the
19 Klein ShopRite Supermarket, because his car was --
20 was there, too. But we lost one of our kids in
21 that.

22 We lost a couple of kids who got hit
23 crossing the street after getting off buses. We
24 had one kid that was running to try to catch up,
25 and the -- and the car didn't see him and hit and

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1 killed him.

2 Q. In your experience, how has the
3 community responded to those losses?

4 A. In my experience, the way they respond
5 to those losses is -- is, you know, grief and, you
6 know, trying to support students who were close to
7 the students who's lost their lives, you know,
8 trying to support the families.

9 Q. Are you aware of any memorials or
10 vigils that were held for those students?

11 A. Yeah, there have been memorials held
12 for some of the students. I don't recall all of
13 them, but I do recall memorials or vigils being
14 held.

15 Q. Are you familiar with the Maryland
16 Department of Health's Youth Risk Behavior Survey
17 results?

18 A. No.

19 Q. You've not heard of that before?

20 A. I have -- I'm not familiar with the
21 results.

22 Q. Are you familiar with the survey?

23 A. Yes.

24 Q. What is it, in your understanding?

25 A. It's a survey that -- to my

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1 recollection, that asks questions about the --
2 basically, surrounding the -- feeling safe, the
3 risk of incidents or events happening or risk of
4 students being involved in incidents.

5 Q. Do you use any of the data that comes
6 out of those surveys in your line of work?

7 A. Perhaps I do. I may not be fully aware
8 of how we are utilizing that data because we work
9 with other offices. So, perhaps.

10 Q. Are there specific data points in there
11 that you would pay closer attention to?

12 A. If I had it in front of me, the results
13 in front of me, I can determine that.

14 Q. Do you remember any types of results in
15 there that you might --

16 A. No.

17 Q. -- pay attention to?

18 A. Not off -- not offhand.

19 Q. Are you aware that it includes data
20 about students that carry weapons, including
21 carrying weapons to school?

22 A. I don't have a recollection.

23 Q. So you don't recall reviewing data
24 about --

25 A. I don't recall the information -- I --

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1 I'm not recalling the information, no.

2 Q. And if you're not recalling the
3 information, I imagine you're not recalling
4 reviewing that information or consulting those
5 numbers?

6 A. Not consulting the numbers, no.

7 Q. Okay. Separate from the survey, do you
8 have any other data or statistics that tracks
9 whether students are carrying weapons to school?

10 A. Do I have data that tracks whether
11 they're carrying weapons to school? No.

12 Q. Have you done any studies to determine
13 how often students at Harford County Public Schools
14 carry weapons?

15 A. No.

16 Q. Have you done any study to determine
17 how often students at Harford County Public Schools
18 are carrying weapons to school?

19 A. No.

20 Q. Have you done any study to determine
21 how often students at Harford County Public Schools
22 are the victims of violent crime?

23 A. No.

24 Q. Are you aware of any data that tracks
25 that number?

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1 A. No.

2 Q. You testified earlier that your
3 department does not independently track reports of
4 fights or incidents of violence beyond reports that
5 are kept by other departments; is that right?

6 A. Right.

7 Q. So you don't independently keep track
8 of what might have led to those fights?

9 A. No.

10 Q. You don't independently keep any
11 data -- sorry. Strike that.

12 Have you done any study into how often
13 social media plays a role in those fights?

14 A. A study, no.

15 Q. Do you have any data reflecting how
16 often social media plays a role in those fights?

17 A. No.

18 Q. Have you done any study to see how
19 often social media plays a role in other types of
20 violence other than fights?

21 A. No study, no.

22 Q. Do you have any data reflecting how
23 often social media plays a role in other types of
24 violence?

25 A. No.

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1 Q. Are you familiar with the term "climate
2 response team"?

3 A. Yes.

4 Q. What is that?

5 A. That's a team of school safe liaisons
6 that I put together two years ago, provided them
7 with some additional training, and designed that
8 team to be able to respond to schools to help them
9 restore and maintain climate in the aftermath of a
10 major situation.

11 Q. When did you create -- or when did you
12 coordinate that team?

13 A. 2023.

14 Q. Since they've existed, have they
15 responded to any major situations?

16 A. Yes.

17 Q. How many?

18 A. Approximately, I would say six or
19 seven.

20 Q. And what types of major situations
21 would you send out the climate response team?

22 A. I would send out a climate response
23 team, once confirmed with the principal, if there's
24 a loss of life of a student or a staff member; if
25 there was a major incident inside of the school

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1 building -- excuse me -- a huge, major fight; if
2 there was an incident like the incident that we
3 experienced in September with the shooting and the
4 loss of life of a student.

5 And so any incident where -- when an
6 event occurs and I talk to the administrator and
7 say, "Do you need any" -- "do you feel you need any
8 additional safety and security support because
9 of" -- so I can deploy members of my climate
10 response team.

11 And my climate response team is
12 designed to be inside of the school building as it
13 tries to -- if it's something that has disrupted
14 the normal day-to-day climate of the school, the
15 team is designed to go in and just -- be just close
16 enough to step in and assist with things, if need
17 be, and just far enough back to let the school
18 proceed as it would typically proceed, but to help
19 them restore and maintain a positive culture and
20 climate in that school in the aftermath of whatever
21 that major situation might be.

22 Q. So you're talking about helping and
23 restoring. What does that look like?

24 A. So when your climate has been disrupted
25 and you've had students that may have missed, you

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1 know, time from school, if you have to make
2 modifications when students reenter a building, you
3 should have some support staff to help students
4 know, A, I know your cafeteria period might
5 typically be during this time period, or you might
6 typically have a change, here's what we're
7 temporarily doing, or what have you, to take that
8 load off of the hands of teachers and principals,
9 to have someone step in and kind of help facilitate
10 whatever temporary change is taking place and to
11 help the students feel safe. Because when it's
12 members of our climate response team, it's either
13 there are safety -- school safe liaisons that are
14 assisting.

15 So that's what it kind of looks like
16 when you're helping to restore and maintain the
17 normal flow of things when they've been knocked off
18 track at a school.

19 Q. How big is the team?

20 A. Oh, it can be as big as 15 people. We
21 have -- we train, extra training, 15 school safe
22 liaisons. But it could be that we deploy 5; it
23 could be that we deploy 3, depending on what the
24 need is for the school.

25 Q. And you mentioned six or seven

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1 instances in which you've deployed --

2 A. Yeah.

3 Q. -- the climate response team since it
4 was founded in 2023, one of which being the
5 shooting last fall?

6 A. Yeah.

7 Q. What were the other incidents?

8 A. We've had students, unfortunately, take
9 their lives. So when it comes to the climate of
10 schools, just keep an eye on -- putting people in
11 the school just to kind of keep an eye on students
12 that need support. Just, you know, being there to
13 support and facilitate. Students who have lost
14 their lives maybe.

15 We've had situations where we had
16 student protests at a school. It was like a
17 national-scale issue. However, our students -- we
18 had students that, one approach, had some -- some
19 issues at a school.

20 So the school couldn't just try to have
21 normal operations and -- and deal with the group --
22 the subset of students that wanted to engage in a
23 process -- protest. So we deployed our climate
24 response team to help support the school --

25 Q. Do you recall what they were

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1 protesting?

2 A. So we -- there was -- it was a national
3 walkout for some -- one of the many national
4 walkouts that students were organizing or what have
5 you.

6 And so if our students did, in fact,
7 walk out, we wanted to make sure they're safe, you
8 know. We want to make sure, if they're walking,
9 they're protesting, whatever, they're not, you
10 know, in harm's way. So I don't recall what the
11 specific issue was this time, but I know we
12 deployed students [sic].

13 Q. Do you know recall other instances of
14 protest even if it didn't involve the climate
15 response team?

16 A. Yes. Before we ever had a climate
17 response team, yeah, we had a major protest one
18 time I recall.

19 Q. What happened then?

20 A. We had a -- when you say "what
21 happened," the incident?

22 Q. I guess let's start with: What were
23 they protesting; do you recall?

24 A. They did -- they did not like the
25 outcome of the allegations that a student

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1 inappropriately touched another student. It was
2 investigated. There were a group of students that
3 didn't like the outcome, and so they staged a -- a
4 walkout.

5 Q. Do you know if there was any change of
6 policy or any response from administration in light
7 of that protest?

8 A. A response, yeah. I mean, they had to
9 respond to it to make sure the students remained
10 safe. But -- but, no. It was -- no, no policy
11 change based on that. It was -- it was truly a
12 groupthink situation.

13 There were some folks that really
14 seized on an opportunity and was able to create
15 this -- this polarizing groupthink situation with
16 some students, and so...

17 Q. How was it polarizing?

18 A. Because they added and injected things
19 that were just not true and, you know, invoked a
20 lot of internal emotion in people.

21 Like, they just -- they were really --
22 it ended up not even being a protest. It ended up
23 being more of a -- I don't know. It was a mess.
24 But it wasn't -- it wasn't really a -- it ended --
25 and in the final analysis, it ended up not really

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1 being a protest. It ended up being more of a
2 disorderly disruption.

3 Q. To the extent it was organized in any
4 way, do you recall what they were demanding or
5 asking for?

6 A. For things to happen to a specific
7 student, specific male student.

8 Q. Disciplinary action?

9 A. Yes.

10 Q. Do you recall how large that disruption
11 or protest was at the time?

12 A. Yeah. It was -- it grew -- it grew
13 pretty large, yeah. Because they did it, like,
14 near when -- probably maybe an hour before the
15 school day was going to end.

16 It was -- it was pretty disruptive
17 because we had -- we had to bring in law
18 enforcement. You had parents that got involved
19 and, you know, kids walking and stepping on top of
20 people's cars and dancing on the rooftops, damaging
21 people's hoods on their cars. It was -- it was a
22 mess.

23 And we had kids we asked, "Why are you
24 out here?"

25 "Well, because everybody else is."

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1 "Okay. Other than that, why?"

2 "Well, because everybody else is."

3 Q. Do you recall when that was?

4 A. Yeah. That was 20 -- that was before
5 COVID. So that was 2019, I think.

6 Q. Do you recall any other similar
7 incidents involving protests?

8 A. To that level, no.

9 Q. Anything short of that level that you
10 can recall?

11 A. Yeah. We had a large protest outside
12 of this window right here because people didn't
13 want -- there were a subset of people in the
14 community that didn't believe people should have to
15 wear masks. So there was a big protest. We had to
16 have law enforcement involved in controlling that
17 situation.

18 Q. Did that one involve students, or was
19 it community members?

20 A. Both. It was just -- everybody was out
21 there, students that didn't want to wear masks,
22 community members that didn't want them to wear
23 them, parents that didn't want -- and then probably
24 on the other side of the street, there was a bunch
25 of people with masks on, saying, "No, we need to

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1 wear masks." So it was -- it was pretty -- it was
2 a pretty big to-do. I mean, it -- it was on news
3 media.

4 Q. You mentioned law enforcement had to
5 get involved in that situation. What was the
6 outcome of that situation?

7 A. I think one -- one young lady was
8 charged. One of my school safe liaisons had to go
9 to the hospital because he was elbowed in his side,
10 and he had had a kidney transplant. He had
11 returned from a kidney transplant two months before
12 all that took place, and one of the people elbowed
13 him. So he had to be taken to the hospital.

14 And -- and law enforcement gave a
15 couple of ultimatums. Some people left. And then
16 when we moved it inside of here, it continued. So
17 what we had to do that night is finish the board
18 meeting by having law enforcement clear everybody
19 out of -- out of here.

20 Q. Are there any other protests or
21 disorderly situations like that that you can
22 recall?

23 A. No, not like that.

24 Q. So we were discussing the climate
25 response team, and you mentioned some types of

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1 situations that they might respond to, including
2 shooting incidents, suicides, large fights,
3 protests. Anything else that they might respond to
4 or have responded to?

5 A. For climate response? No.

6 Q. Are you familiar with the term
7 "school safety council"?

8 A. "School safety council"? I'm -- I'm
9 familiar with the term, yes.

10 Q. Do you -- does Harford County Public
11 Schools have a school safety council, as far as
12 you're aware?

13 A. A school safety council? They should
14 have -- every school has a safety team, has a
15 school safety team. And then on the
16 superintendent's student advisory council, we have
17 a student safety advisory.

18 Q. What is that?

19 A. That's a group of students from each
20 one of our three regions over the past couple of
21 years; that when the superintendent has his
22 meetings with his student advisory council, a
23 subgroup of those students participate to talk
24 about ways that we can improve safety in Harford
25 County Public Schools, ideas that they have from

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1 the lens of a student surrounding safety concerns
2 that they have, and they have an opportunity to
3 express those things during those meetings.

4 Q. Do you recall any of the feedback they
5 provided in any of those meetings?

6 A. Yes, I recall some of the feedback they
7 provided in some of those meetings.

8 Q. What types of feedback did you receive
9 from them?

10 A. Ideas that they have around the weapons
11 detection before we ever got weapons detection.
12 When we first started it, they had questions about,
13 you know, if we would get them, what their thoughts
14 were about them.

15 They discussed the active assailant
16 drills. A lot of discussion about bullying would
17 come up. That has always been a hot topic of our
18 student safety council, bullying.

19 They were really concerned that -- they
20 were really concerned that when bullying starts in
21 this day and age, it never really seems to end.
22 Because you can -- you know, you -- I remember one
23 young lady talking to me from -- I can't remember
24 what school. But we were having one of our
25 sessions, and she says, "You know, there probably

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1 used to be a time where the bullying stopped until
2 the next day when you started bullying in school
3 again, but now you can get bullied 24 hours a day
4 on social media. People can create, you know,
5 accounts and target you. And even if you think you
6 block them, they can keep sending stuff to you."

7 So there was never a session that we
8 had in that meeting -- even if we talked about
9 other things, bullying was a recurring theme with
10 that team and trying to figure out how we could
11 work around it. And then we just realized in
12 some -- in some areas, there were impossibilities
13 because you can't stop a person from, you know,
14 making an account.

15 And then, you know, they would talk
16 about -- you know, some of them would talk about
17 friends that they had. They were just forced to
18 not even be able to participate in social media
19 because of bullying; so, therefore, they don't have
20 any type of -- they don't have to worry about it.
21 The only thing they have to deal with is the
22 in-person stuff inside of the school.

23 Q. Is your team responsible for responding
24 to reports of bullying?

25 A. When you say "responding," what do you

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1 mean?

2 Q. In the -- sorry. Strike that.

3 Who at Harford County Public Schools is
4 primarily responsible for handling incidents of
5 bullying?

6 A. Well, I would say, at the school level,
7 it will start with the administrator, with the --
8 with the principal. If a person makes a report of
9 bullying and harassment, then that would go to a
10 separate -- I don't know the title of the office,
11 but I know Dr. Stanton, you know, helps to process
12 those forms or whatever of bullying and harassment.

13 Q. Your team is not responsible for those
14 bullying and harassment forms?

15 A. No, not at all.

16 Q. Do you have access to them?

17 A. No. I mean, I could probably request
18 them. But me having some portal that I go to and
19 just access the bullying reports, no.

20 Q. Have you ever reviewed them?

21 A. Yes.

22 Q. Do you review them regularly?

23 A. When they come through the Maryland
24 Center for School Safety. Because what happens is,
25 now that we have the -- the safe schools hotline,

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1 I'm the primary on that. So if a tip comes in, it
2 comes to me, I review it, triage it to determine
3 where it needs to go. And then I send it off
4 and -- to say, "Hey, this came through the Maryland
5 safe schools tip line. John Doe's parent went on
6 and said this is happening to their child. Here's
7 what it looks like. Here's what's happening.
8 Here's how it's impacting their child, and it's
9 happening at this school."

10 It could be anonymous. It could be a
11 student saying, "My friend is consistently being
12 bullied and harassed, and they attend this school,"
13 whatever. So I get that, and then I forward that
14 on to the school and Dr. Stanton and so that they
15 can start to work through whatever that situation
16 is.

17 Q. How long have you been responsible for
18 the school -- safe schools hotline?

19 A. Since it started.

20 Q. When did it start?

21 A. 20 -- with the Maryland Safe to --
22 Maryland Safe to Learn Act.

23 Q. And what is the Maryland Center of
24 School Safety?

25 A. What is it?

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1 Q. Yes.

2 A. It's a -- it's a group that works under
3 the governor's office that really makes sure that
4 all the security directors in the school districts
5 around the state has and receives information and
6 shares information.

7 But it also ensures that the mandates
8 under the Maryland Safe to Learn Act, the reporting
9 mandates and all of that, Maryland Center for
10 School Safety makes sure that all that information
11 is sent to them and maintained by them.

12 Q. So in operating the safe schools
13 hotline, when you get a report of bullying, you
14 said you forward it on to the school and
15 Dr. Stanton so they can start to work through
16 whatever that situation is --

17 A. Yes.

18 Q. -- right?

19 A. Yes.

20 Q. Who is Dr. Stanton?

21 A. I don't know what her exact title is,
22 but she works with our students. And she's
23 actually the student advisory -- all the particular
24 student advisory committees. She heads that up for
25 the superintendent.

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1 Q. Once forwarding that information along
2 to them, do you or your team do any further
3 investigation --

4 A. No. No.

5 Q. -- in a bullying report?

6 A. No, we don't do any further
7 investigation of a -- of a bullying report.

8 Q. Do you document the report of bullying
9 in any way?

10 A. When it comes to me through the
11 Maryland safe schools tip line, yeah, I maintain
12 documentation of that.

13 Q. What is that documentation?

14 A. Email.

15 Q. And what would you include in an email
16 reporting that?

17 A. I don't -- I don't include anything in it.
18 When I get it -- when I get that --

19 Q. Okay.

20 A. -- it has all of the information in it.
21 All I do is save it.

22 Q. So the safe schools hotline, is it a
23 telephone line or is it also online or email
24 communications?

25 A. Yeah, I think they have three or four

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1 different modes that you can report.

2 Q. What are those modes?

3 A. I don't know them all. But I know that
4 you can do it online. I know that you can call. I
5 think you can send a text to a number -- to a code
6 or whatever. And they may have a couple more, but
7 those are what I'm familiar with.

8 Q. And so whatever form that comes in as,
9 whether it's an email or another form, that would
10 be your documentation of the situation?

11 A. I'm only -- I'm always going to get it
12 in one format. So no matter how the center
13 receives it, they -- they -- they transcribe all
14 that information into what's called the "tip
15 manager." And they fill it all out.

16 So every time I see it -- it doesn't
17 matter what -- what the tip is, every time I see
18 it, it looks the same on my end.

19 Q. Do you know if there's a database or
20 software they use to manage that?

21 A. I don't know.

22 MS. WEIANT: Let's take a five-minute
23 break.

24 MR. LEGG: Sounds good.

25 THE VIDEOGRAPHER: We are now going off

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1 the record at 2:41 p.m.

2 * * *

3 (Whereupon, there was a recess in the
4 proceedings from 2:41 p.m. to 3:02 p.m.)

5 * * *

6 THE VIDEOGRAPHER: We're now going back
7 on the record at 3:02 p.m.

8 BY MS. WEIANT:

9 Q. So we have talked about several
10 different ways that you and your team go about
11 protecting students' safety, including human
12 resources, so student resource officers, school
13 safety liaisons, regional safety supervisors,
14 climate response teams, and then resources or
15 services, including safe schools hotline. You do
16 active assailant drills, or at least did in the
17 past; although, they might have changed. Weapons
18 detection devices, security cameras.

19 Are there any other programs or
20 services that you would like to highlight?

21 A. No.

22 Q. And many of those have been implemented
23 since you joined Harford County Public Schools in
24 2018, right?

25 A. Yes.

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1 Q. All with the goal of protecting staff
2 and students?

3 A. Yes.

4 Q. Keeping them safe at school?

5 A. Yes.

6 Q. And despite all of these efforts to
7 strengthen security, can you guarantee that
8 students will be safe at school?

9 MR. LEGG: Objection to form.
10 Foundation.

11 THE WITNESS: No.

12 (BROOKS EXHIBIT 4, Article dated
13 8/24/18 titled Harford Students Returning Sept. 4
14 Should Feel Safer in School, HCPS Security Chief
15 Says, was marked for identification.)

16 BY MS. WEIANT:

17 Q. I'm going to show you what has been
18 marked as Brooks Exhibit 4.

19 MS. WEIANT: This is Tab 42.

20 BY MS. WEIANT:

21 Q. Go ahead and take a moment to review
22 this document.

23 Have you had time to review the
24 document?

25 A. Yes.

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1 Q. And this is a news article dated
2 August 24th, 2018, titled "Harford students
3 returning September 4th should feel safer in
4 school, HCPS security chief says."

5 Do you see that?

6 A. Yes.

7 Q. Are you familiar with this article?

8 A. Yes.

9 Q. This article quotes you?

10 A. Yes.

11 Q. In the second paragraph, it says:
12 There have been a number of school shootings in
13 recent years, and local officials have acknowledged
14 that it's not if but, rather, when an incident
15 might happen in one of Harford's public or private
16 schools.

17 Do you see that?

18 A. Yes.

19 Q. Do you agree with that statement?

20 A. Yes.

21 MR. LEGG: Objection to form.

22 THE WITNESS: I'm sorry.

23 BY MS. WEIANT:

24 Q. And as we've discussed today, since
25 this article was published in 2018, unfortunately,

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1 there have been school shooting incidents at
2 Harford County Public Schools, correct?

3 A. Correct.

4 Q. About halfway down the page, there's a
5 paragraph starting with "Right now." Do you see
6 that?

7 A. Yes.

8 Q. In quotes, it says: Right now, when it
9 comes to your student walking through the doors of
10 Harford County Public Schools, you can know that we
11 do take our security protocol safety -- seriously,
12 end quote.

13 And it attributes that quote to you.
14 Do you see that?

15 A. Yeah, I do.

16 Q. Is that your view?

17 A. Yes.

18 Q. And that includes all of the various
19 measures that we've discussed today?

20 A. Well, not during that time because some
21 of those weren't even in place, but yes.

22 Q. And -- okay. So at the time, in 2018,
23 when you were saying you were taking your security
24 protocol seriously, part of that was that in the
25 future you planned to strengthen your security

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1 protocols?

2 A. Yes.

3 Q. And you have done so?

4 A. Yes.

5 Q. In the next paragraph, again, in
6 quotes, it says: Are there any absolutes? I tell
7 people there are no absolutes.

8 Again, it attributes that quote to you.
9 Do you see that?

10 A. Yes.

11 Q. Is that your view?

12 A. Yes.

13 Q. And is that what you tell people?

14 A. Yes.

15 Q. Do you make any promises that students
16 and staff will remain safe when at school?

17 A. No.

18 MR. LEGG: Object to the form.

19 BY MS. WEIANT:

20 Q. Could you make any promises that
21 students and staff will remain safe --

22 MR. LEGG: Objection to form.

23 BY MS. WEIANT:

24 Q. -- while at school?

25 A. No.

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1 Q. You can set that exhibit aside.

2 Do you agree that social media has its
3 benefits for young people?

4 MR. LEGG: Objection to form and
5 foundation.

6 THE WITNESS: Yes.

7 BY MS. WEIANT:

8 Q. And you've said so publicly?

9 A. I don't recall if I've ever said so
10 publicly, but I do agree with what you just asked
11 me.

12 Q. Do you agree that they can find
13 opportunities to volunteer and get service learning
14 hours from social media?

15 A. Yes.

16 Q. Do you agree they can connect with
17 their peers on social media?

18 A. Yes.

19 Q. Do you agree that during the pandemic
20 it allowed students to connect with their teachers?

21 MR. LEGG: Objection to form and
22 foundation.

23 THE WITNESS: Yes.

24 BY MS. WEIANT:

25 Q. And do you agree that social media is

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1 not all gloom and doom?

2 MR. LEGG: Objection to form and
3 foundation.

4 THE WITNESS: Yes, I do agree with
5 that.

6 BY MS. WEIANT:

7 Q. You agree there are some positive
8 aspects?

9 A. Yes.

10 MR. LEGG: Objection to form and
11 foundation.

12 BY MS. WEIANT:

13 Q. Do you believe that parents need to
14 monitor what their children are doing on the
15 Internet?

16 A. Yes.

17 Q. Do you know how much time staff in the
18 safety and security department devote to addressing
19 issues related to social media?

20 A. Yes. A large -- a great amount of
21 time.

22 Q. How much?

23 A. My staff? Throughout their -- their
24 day, their week, I would say anywhere from 40 to 45
25 percent of their time is dealing with students and

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1 situations where we're finding out conflicts either
2 originated on using social media, or if they
3 started in school, continue via the use of social
4 media in these conflicts.

5 There's almost nothing that we deal
6 with now when it comes to interpersonal conflict
7 between students that doesn't have a nexus to
8 social media.

9 Q. So when you say "has a nexus to social
10 media," are you talking about students making
11 threats on social media?

12 A. Making threats on social media; using
13 social media to bully, using social media to make
14 fake accounts and put out embarrassing pictures and
15 information about other students; going on social
16 media to discuss private and personal things about
17 students and their families.

18 I mean, the stuff -- the stuff I can
19 tell you is just the stuff that comes off the top
20 of my head because it's stuff that we're dealing
21 with on the regular. And sometimes, unfortunately,
22 it escalates to the point that we have to try to
23 use some preventive measures to make sure the
24 students don't escalate to physical confrontation.
25 That doesn't always work, but -- because we might

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1 not always be able to stop that.

2 But we spend -- there's very little
3 that we spend time on when it comes to conflict
4 between students where it has not -- it doesn't
5 come up where somebody either posted something
6 about somebody, somebody invited somebody to meet
7 them in the bathroom at a certain period. Things
8 are said, and it allows a layer of anonymity for
9 some students.

10 (BROOKS EXHIBIT 5, Plaintiff Board of
11 Education of Harford County's Amended Objections
12 and Responses to Defendants' Interrogatories
13 (Set 3), was marked for identification.)

14 BY MS. WEIANT:

15 Q. I'm going to show you what has been
16 marked Brooks Exhibit 5.

17 MS. WEIANT: Which is Tab 60.

18 BY MS. WEIANT:

19 Q. I'll give you a moment to skim it. You
20 don't have to read -- you're welcome to review, but
21 you don't have to read the whole thing. I'll point
22 you to specific sections.

23 A. Okay.

24 Q. You've had time to review this
25 document?

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1 A. Yes.

2 Q. And on the first page, it says this is
3 Plaintiff Board of Education of Harford County's
4 Amended Objections and Responses to Defendants'
5 Interrogatories (Set 3).

6 Have you seen this document before?

7 A. No, I don't recall seeing this document
8 before.

9 Q. On Page 3 and over on to Page 4, there
10 is a table. Have you seen that table before?

11 A. No.

12 Q. If you go to Page 2, under
13 Interrogatory Number 5, this is a question that was
14 presented to plaintiffs. It asks Plaintiff for --
15 Board of Education of Harford County for each
16 category of damages to calculate how much of that
17 was related to social media.

18 So on Page 4, starting on Line 23, it
19 says: These assessments are plaintiff's estimate
20 of the proportion of staff time lost and the
21 proportion of costs and expenditures that are
22 attributable to defendants' conduct.

23 Do you see that?

24 A. Yes.

25 Q. Do you know what "defendants' conduct"

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1 here is referring to?

2 A. No.

3 Q. Are you familiar with the allegations
4 in this lawsuit?

5 A. Somewhat.

6 Q. Do you know who the defendants are in
7 this lawsuit?

8 A. Yeah, I think the people that
9 introduced themselves representing the companies
10 earlier.

11 Q. Do you recall which companies those
12 are?

13 A. Yeah. YouTube, Facebook, Snapchat,
14 Instagram. Yeah. YouTube, Snapchat, Instagram,
15 Facebook.

16 Q. Have you read the complaint in this
17 lawsuit?

18 A. No.

19 Q. What is your understanding of the
20 allegations against the defendants in this lawsuit?

21 A. My understanding of the allegations for
22 the lawsuit is that there's a connection between
23 events that take place in the schools -- in our
24 schools and access to -- students have to social
25 media, to use those platforms to further any of

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1 those agendas that they have for using social media
2 to engage in activities that we don't want to have
3 in -- in the schools.

4 Q. So going back to Exhibit -- Exhibit 5,
5 on the -- towards the end --

6 A. Uh-huh.

7 Q. -- there's an Attachment A.

8 A. Uh-huh.

9 Q. And there is a chart titled
10 "Program/Department Worksheet."

11 A. Uh-huh.

12 Q. Do you see that?

13 A. Yes.

14 Q. Have you seen this chart before?

15 A. No.

16 Q. Roughly two-thirds of the way down in
17 that chart, there is an entry for safety and
18 security.

19 A. Uh-huh.

20 Q. Do you see that?

21 A. Yes.

22 Q. And in the column next to that, under
23 column titled "Subtotal Fiscal Year 2016 to
24 2024" --

25 A. Uh-huh.

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1 Q. -- it says \$12,055,311. Do you see
2 that?

3 A. Yes.

4 Q. The column next to that is titled
5 "Weight in Percentage," and it lists 40 percent.
6 Do you see that?

7 A. Yes.

8 Q. Do you know what that 40 percent number
9 is referring to?

10 A. Well, based on the top of the sheet,
11 this says "damages." I would say the amount of
12 time -- measuring the amount of time that the
13 office of safety and security spends with issues
14 related to our students and social media.

15 Q. And that is based on your review of
16 this document in the past few minutes?

17 MR. LEGG: Objection to form.

18 THE WITNESS: No. That's based on me
19 being asked before we were ever here to talk about
20 how much time -- I was asked about how much time, I
21 think, my office -- our people spend on issues that
22 are related to our students and conflicts with
23 social media on investigating. I was asked that
24 question before.

25 BY MS. WEIANT:

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1 Q. Are you referring to my question
2 earlier or somebody else's question?

3 A. Somebody else's question earlier, yes.

4 Q. Did you help generate -- did you help
5 create this document?

6 A. No.

7 Q. On Page 4, beginning on Line 25,
8 picking up where we left off earlier, it says: The
9 proportion of time or money spent is expressed as a
10 percentage of the overall budget for each relevant
11 department/program, which is deemed a weight
12 percentage.

13 A. Uh-huh.

14 Q. The weight percentages assigned to each
15 department/program are stated in Attachment A.

16 Do you see that?

17 A. Yes.

18 Q. Did you select the weight percentage
19 that appears next to the safety and security
20 department in Attachment A?

21 A. Yes.

22 Q. How did you do that?

23 A. Based on the amount of time that we
24 spend investigating, responding to or mitigating
25 conflicts with students that we have to go back and

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1 a lot of cases investigate and try to find the
2 social media posts, or a lot of times students will
3 have it. They will have screenshots. They will
4 have other things.

5 And so, again, I came up with looking
6 at what we do on a daily basis and how much of it
7 we do and what the connection is to social media
8 and our students avoiding conflict.

9 Q. When selecting the 40 percent number,
10 did you talk to any of your staff members about how
11 much time they spend addressing issues related to
12 social media?

13 A. Yeah, I did talk to my folks about
14 that, the amount of time, but not necessarily based
15 on this question alone.

16 I talked to them about -- before this
17 ever came along, we were talking about how we could
18 address those issues because we were spending so
19 much time chasing down and trying to sort these
20 things out and trying to figure out, you know, who
21 posted what, who said what, whether it's real,
22 whether we can connect it back to somebody.

23 So I already knew the amount of time
24 and effort we were putting into these situations
25 connected to social media.

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1 Q. When selecting the 40 percent number
2 more recently --

3 A. Uh-huh.

4 Q. -- did you talk to any of your staff
5 members about how much time they spend addressing
6 issues related to social media?

7 A. No.

8 Q. Did you ask any of them exactly how
9 much time they spend addressing issues related --

10 A. Exactly, no.

11 Q. -- to social media?

12 A. No.

13 Q. Did you look at any documents to
14 determine how much time you and your staff are
15 spending addressing issues related to social media?

16 A. Just the reports that -- that come
17 across where -- well, I shouldn't say "reports."

18 Just information that comes across
19 where my people are working on trying to resolve
20 issues and trying to figure out where the -- the
21 beginning of the issue started or how the issue
22 continued to be carried on very often is social
23 media-related investigations that they're doing.

24 Q. What reports?

25 A. That's why I said not "reports," but --

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1 Q. I'm sorry.

2 A. -- information. Yeah, information.

3 Q. And what documents would those be in?

4 A. Those would be in like the email
5 documents, documents that they might have where
6 they have captured copies of threats like you sent
7 me -- I'm sorry. You showed me something earlier
8 that was written on a desk. But way more
9 exponentially than that do we get shown stuff in
10 students' phones that was captured where they were
11 either harassed, bullied, threatened or whatever.

12 Q. So in calculating this 40 percent
13 number, you looked at emails and reports of threats
14 often that came in via email or other means. Did
15 you look at any other documents?

16 A. No.

17 Q. Do those emails say how much time was
18 spent addressing --

19 A. I don't recall saying emails. Did I
20 say emails, if I said I get that during emails?
21 I'm not sure if I said emails.

22 Q. Yes. So you said, "Those would be in
23 like the email documents, documents that they might
24 have where they have captured copies of threats
25 like you showed me earlier."

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1 A. That shouldn't be email documents,
2 then. Those should be captured images on students'
3 phones.

4 Q. How would you see those captured
5 images?

6 A. Our people would see those, capture
7 them, and just when the students show it to them
8 when they're investigating and they're asking,
9 "Why did this occur?"

10 "Well, this was said about me on social
11 media, or this threat."

12 "Well, do you have it?"

13 "Yeah." And students will have it.
14 They'll show it to our people.

15 Q. And from your staff, would there be any
16 documents showing what your staff did after the
17 student reported that or after they saw it or had
18 that conversation --

19 A. There wouldn't be any documents of what
20 they did because they're going to involve --
21 they're never going to -- they're never going to
22 take the full lead on something like that without
23 the administrators being involved in that
24 situation.

25 They don't have as much authority to

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1 determine where it's going to go in terms of
2 outcome, determine where it's going to go in terms
3 of discipline. They don't have that type of
4 authority.

5 So they're always going to get the
6 administrator involved, even if they are the
7 primary person who it was shown to.

8 Q. So when selecting this 40 percent
9 number, specifically this 40 percent number, you
10 did not have any renewed conversations with your
11 staff about how they spend their time and how that
12 might relate to social media?

13 A. No.

14 Q. And of documents you might have
15 reviewed, you may have reviewed emails, but
16 primarily most of the information that you were
17 relying on would not be documented in any form?

18 A. Correct.

19 Q. In the 40 percent of time that you
20 believe your staff -- you and your staff spend
21 addressing issues related to social media, what
22 exactly are you doing in that 40 percent of time?

23 A. Determining who all is involved in the
24 content on social media; determining how long it's
25 been going on; trying to backtrack, you know, how

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1 long it's been going on; specifically what's been
2 said in there; whether or not it's been a mutual
3 back-and-forth; whether it's not -- whether it's
4 been a bullying; whether threats have been
5 associated with it.

6 When it's anonymous, it's a little more
7 difficult, but sometimes we've been able to work
8 our way through those as well and determine who the
9 individual was.

10 And then trying to go on, if we can, go
11 on, ourselves, to the platforms to try to see if we
12 can see -- see if the content is still there.

13 And then from there, spending time, you
14 know, trying to mediate whatever the conflict was;
15 spending time with the parents; have the parents
16 come in for conferences so we can talk to them; you
17 know, see if we can get their support to get
18 students to cease and desist.

19 And then, you know, you've got to do
20 follow-up. You know, have you gotten any more of
21 these types of messages? Is this -- is this
22 continuing or whatever? Because you only have so
23 much control when trying to work these things out
24 before somebody stops. It's, like, difficult to
25 stop it. So, you know, you just continue to work

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1 through it the best way you can.

2 Q. Earlier, you testified that there's
3 very little that we spend time on when it comes to
4 conflict between students where it has not come up
5 related to social media.

6 So you said there was very little time
7 spent that did not connect to that. So why did you
8 select 40 percent?

9 A. Because not every situation between the
10 students involves us necessarily having to go
11 deep -- do a deep scrub on. Some of them do; some
12 of them don't.

13 So even though there's very few issues
14 of conflict, there are other issues. There are
15 issues where students -- there's safety issues
16 where there's no other students involved. There's
17 just -- we spend time doing a number of things when
18 it comes to students that -- outside of them having
19 a conflict with another student.

20 You know, we -- we deal with safety
21 issues where students are in conflict with adults
22 where they try to assault adults. It has nothing
23 to do with the social media piece.

24 We have students who are in conflict
25 with, you know, people from the community who may

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1 not even be other students inside of the school or
2 whatever. So we have to deal with those issues as
3 well.

4 But when we get our students inside of
5 the school who got into a fight in the cafeteria
6 and we find out it's been an ongoing situation,
7 there's been some -- most of the time when we look
8 at that, there's been some portion of that conflict
9 that had some social -- something that was said on
10 social media.

11 Q. In this conversation we have just had,
12 when you say "social media," what platforms are you
13 talking about?

14 A. Facebook, Snapchat, YouTube -- some --
15 when I first got here, definitely YouTube when I
16 first got here. These kids were making rap videos
17 and saying things -- sending subliminal messages to
18 each other in these rap videos in this -- in the
19 music. Instagram. And then you have so many
20 other, you know, platforms that these students
21 uses.

22 But, yeah, typically, those are the
23 platforms that they use to engage in the
24 back-and-forth or what have you.

25 Q. You said there are many other

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1 platforms. What platforms are those?

2 A. I have no idea. But I have a
3 17-year-old son, so I just know that there -- he
4 says stuff that I never even heard of before.

5 Q. You can't name any of them?

6 A. No.

7 Q. But you know there are others --

8 A. I know there are others.

9 Q. -- they use?

10 Discord?

11 A. I'm familiar with Discord. More like
12 Patreon, is what you mean?

13 Q. I have to check on that one.

14 Have you heard of BeReal?

15 A. No.

16 Q. GroupMe?

17 A. Who?

18 Q. GroupMe?

19 A. GroupMe? GroupMe? Was it GroupMe?
20 No. Not -- maybe. Maybe I've heard of GroupMe.

21 Q. What about X or Twitter?

22 A. Yes.

23 Q. Students use that?

24 A. Yes.

25 (BROOKS EXHIBIT 6, Email dated 1/15/18,

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1 Subject: MCFSS Conference Call Notes - Call
2 Reminder Tuesday January 16, 2018 @ 10 am EST,
3 Bates HCPS_00553865-70, was marked for
4 identification.)

5 BY MS. WEIANT:

6 Q. I'm going to show you what has been
7 marked Brooks Exhibit 6.

8 MS. WEIANT: This is Tab 34.

9 BY MS. WEIANT:

10 Q. It's a email dated January 15th, 2018,
11 from Edward Clarke. There's a very long list of
12 recipients before the email itself begins.

13 Do you know who Edward Clarke is?

14 A. Yes.

15 Q. Who is Edward Clarke?

16 A. Retired -- I will forget what his title
17 was. I think he might have been director of the
18 Maryland Center for School Safety.

19 Q. And the subject of this email is
20 "MCFSS Conference Call Notes." Do you know what
21 "MCFSS" stands for?

22 A. No, but that might be -- no, I don't
23 know. I just know Maryland Center for School
24 Safety. I'm not sure of the other -- what the F or
25 whatever.

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1 Q. Do you attend conference calls for the
2 Maryland Center for School Safety?

3 A. Yes.

4 Q. On the second page of the substantive
5 email, the page ending in 869 in the bottom right,
6 about halfway down, there's a -- a bullet point
7 that starts with "Donoven Brooks." Do you see
8 that?

9 A. Yes. Yes.

10 Q. It says: Donoven Brooks, new Harford
11 County Public Schools Security Director, discussed
12 an anonymous social media app known as "Sarahah"
13 that students have been using to post threatening
14 messages without being detected.

15 Do you see that?

16 A. Yes.

17 Q. What is Sarahah?

18 A. I don't really know. It's -- it's an
19 app, but I'm not really sure.

20 Q. Do you recall discussing this issue
21 with the Maryland Center for School Safety?

22 A. I do.

23 Q. So when it says you discussed an
24 anonymous social media app known as "Sarahah" where
25 students have been posting threatening messages,

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1 did you report that to the Maryland Center for
2 School Safety?

3 A. Yes.

4 Q. Do you recall -- scratch that. I'm
5 sorry. Strike that.

6 Do you recall what happened during this
7 conversation when you raised this issue, anonymous
8 messages on Sarahah?

9 A. Yeah. So when we first started these
10 calls, the reason that this list is so long is
11 because it wasn't just the security directors on
12 the call. It was every law enforcement agency as
13 well. So my colleagues from the sheriff's office
14 and the other three jurisdictions were also on
15 these calls.

16 So we had our intel meeting for law
17 enforcement, which I would attend weekly. I
18 learned about this app at the intel meeting from my
19 law enforcement partners.

20 So they -- when we did this -- your law
21 enforcement partners really didn't say anything.
22 They would -- anything they wanted to provide, they
23 would give to the directors of security for each
24 jurisdiction, because that would be the person that
25 would do, like, the talking.

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1 And I remember very specifically that
2 our sheriff's office SRO supervisor had said,
3 "Hey, when you do the call, you want to share this
4 information with them, because we've been getting a
5 couple of situations that we've been investigating,
6 and it's coming back to this app."

7 Their CID department was investigating
8 some threats that were coming back to that app. So
9 when it was time, the information that they gave
10 me, I shared it out so it could be shared with the
11 other jurisdictions, which was common, not just for
12 us, but other jurisdictions would share stuff, and
13 it would be coming from their law enforcement.

14 Q. When you and your staff spend time
15 addressing issues related to social media, that
16 could include things like anonymous social media
17 posts on something like Sarahah, right?

18 A. Yes.

19 Q. When -- when responding to situations
20 or incidents or threats on social media, do you
21 document where each threat was made?

22 A. Do we document where each threat was
23 made?

24 Q. Sorry. Yes.

25 When responding to situations or

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1 incidents or threats on social media, do you
2 respond where students or other community members
3 made that threat?

4 A. We provide that information to law
5 enforcement when we give them the information so it
6 can be included in their report.

7 Q. So you would have a document of every
8 threat that was made on social media that you have
9 learned of?

10 A. We wouldn't, no. But anyone that was
11 reported to law enforcement, yes, they would have a
12 document, if they wrote a report on it.

13 Q. And that specifically --

14 A. But every single threat that's ever
15 been reported, I would say I don't -- we don't --
16 my office doesn't have a copy of every single
17 report, no.

18 Q. Does Harford County Public Schools have
19 a YouTube channel?

20 A. Yes.

21 Q. Who runs that channel?

22 A. Office of communications.

23 Q. And who is in charge of the office of
24 communications?

25 A. Ms. Jillian Lader.

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1 Q. Are you familiar with what content is
2 posted on the Harford County Public Schools'
3 YouTube page?

4 A. Yes.

5 Q. What type of content?

6 A. Content to provide information to our
7 families and communities. General information
8 about our school district from different various
9 offices and departments will provide information
10 that's useful to our students in the community.

11 Q. Have you appeared in videos on the
12 Harford County Public Schools YouTube channel?

13 A. Yes.

14 Q. Do you know how many?

15 A. I don't.

16 Q. What were those videos about?

17 A. Safety and security.

18 Q. Do you know roughly when those videos
19 were posted on YouTube?

20 A. Between -- probably -- the first video
21 I ever made? I don't know. Probably between 2020
22 and 2024.

23 Q. And what was the purpose of making
24 videos about safety and security and posting them
25 on YouTube?

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1 A. The purpose is to give parents
2 strategies -- parents and students strategies,
3 things to look -- to be aware of, and strategies
4 for maintaining safety and security, and providing
5 useful information to parents.

6 Q. Does Harford County Public Schools have
7 a Facebook page?

8 A. Yes.

9 Q. Do you know who runs that page?

10 A. I believe it's Ms. Jillian Lader who
11 runs that page as well, office of communication.

12 Q. Have you ever posted content to the
13 Harford County Public Schools Facebook page?

14 A. Have I posted content?

15 Q. Yes.

16 A. No. If I did, I don't remember.

17 Q. Have you appeared in content posted to
18 that Facebook page?

19 A. I don't know. I don't know if they
20 posted the videos I've done to the -- I don't
21 really go to the HCPS Facebook page.

22 Q. Does Harford County Public Schools have
23 a TikTok account?

24 A. Oh, that, I don't know.

25 Q. Does Harford County Public Schools have

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1 an Instagram account?

2 A. I don't know.

3 Q. Does Harford County Public Schools have
4 a Snapchat account?

5 A. I don't know.

6 Q. Have you ever used YouTube?

7 A. Yes.

8 Q. Do you have a YouTube account?

9 A. Yes.

10 Q. Do you log in to YouTube when you use
11 YouTube?

12 A. Do I log in? Yeah. Uh-huh.

13 Q. Do you post content to your YouTube
14 account?

15 A. Not now, no.

16 Q. Have you ever?

17 A. Yes.

18 Q. When was that?

19 A. 2024.

20 Q. So last year?

21 A. Yes.

22 Q. Did you post content -- how -- sorry.
23 Strike that.

24 How often did you post content to your
25 YouTube account?

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1 A. How often? I don't know. I might have
2 published -- when you say "content," can you
3 describe what "content" is, what you're -- what
4 you're meaning as context?

5 Q. Have you uploaded videos to a YouTube
6 channel?

7 A. Oh, yes. How frequent have I done
8 that? I don't know. Every -- when I was doing it,
9 every couple of weeks or so. Every week, every
10 couple of weeks.

11 Q. And that was all in 2024?

12 A. As far as uploading content, yeah,
13 2020 -- yeah, 2023, 2024. I would say 2023, 2024.

14 Q. What type of videos did you upload?

15 A. I don't know. Fun videos.

16 Q. What would you consider fun videos?

17 A. Talking about current events. Yeah.

18 Q. Who was your intended audience?

19 A. I would say probably people between
20 like 35 and up.

21 Q. Do you ever use YouTube to watch
22 videos?

23 A. Yes, I do.

24 Q. What types of videos do you watch?

25 A. Primarily, investment videos. So

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1 probably 95 percent, stock market videos.

2 Q. What would you say the other 5 percent
3 is?

4 A. Other 5 percent is sports training.
5 I'm a big boxing enthusiast. So the other 5,
6 10 percent is probably boxing-related stuff.

7 Q. Anything else that you can recall?

8 A. On the regular, no, unless it's just
9 something I scroll past on a short or something.
10 But stuff that I actively seek out is investment
11 stuff and sports stuff.

12 Q. Do you use YouTube to listen to music?

13 A. Yes. I have YouTube music.

14 Q. Do you use YouTube as a streaming
15 service?

16 A. Like -- for, like, my primary
17 television-type stuff and all that?

18 Q. Do you use YouTube TV?

19 A. No. If it's included in a subscription
20 I have or something, maybe I'm not taking advantage
21 of it.

22 Q. How often would you say you use
23 YouTube?

24 A. Every day.

25 Q. How much time do you spend on YouTube

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1 every day?

2 A. Probably anywhere from 45 minutes to
3 maybe an hour, like that.

4 Q. And that's primarily on the investment
5 videos --

6 A. Yes.

7 Q. -- you talked about?

8 A. I start -- that's how I start my day.
9 I'm brushing my teeth, and I'm listening to market
10 updates and, you know, why the market may be
11 trending up or down or whatever. That's how I
12 start my day, so...

13 I'm doing other stuff, but it's playing
14 in the background. I'm listening.

15 Q. Do you also use -- strike that.

16 How often do you use YouTube to listen
17 to music?

18 A. In my car.

19 Q. And how frequently would you say you
20 listen to music from YouTube in your car?

21 A. Maybe three or four times a week,
22 because, again, in my car I'm putting on investment
23 stuff. I'm riding up the road listening to one of
24 my guys that I subscribe to.

25 Q. When was the last time you used

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1 YouTube?

2 A. Yesterday.

3 Q. Do you have any children?

4 A. I do.

5 Q. How many children do you have?

6 A. Why do you want to know that? Four.

7 Q. How old are your children?

8 A. 36, 32, 26, and 17.

9 THE REPORTER: You dropped your mic.

10 THE WITNESS: Oh, I'm sorry.

11 BY MS. WEIANT:

12 Q. Is your 17-year-old still living at
13 home?

14 A. Yes.

15 Q. Are they in high school?

16 A. He's a -- is a senior year at high
17 school.

18 Q. Do you know if he has ever used
19 YouTube?

20 A. Yes.

21 Q. Do you know if he has a YouTube
22 account?

23 A. Yes.

24 Q. Do you know how he uses his YouTube
25 account?

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1 A. Yeah. I've seen him load his
2 basketball and track videos. He -- he's an
3 athlete, so he's loaded his videos.

4 Q. How often does he upload to YouTube?

5 A. Not often.

6 Q. Did you help him set up his YouTube
7 account?

8 MR. LEGG: Objection to form and
9 foundation.

10 THE WITNESS: No, I didn't help him set
11 up his -- I believe his mother did because he
12 wasn't with me when he set it up.

13 BY MS. WEIANT:

14 Q. Do you know if he also uses YouTube to
15 watch videos or listen to music?

16 A. Yes. He does both.

17 Q. Do you know if he has used YouTube in
18 the classroom?

19 A. Yes, I know he has used it because he's
20 done a couple projects that we did together where
21 he had to interview people. And it was uploaded to
22 YouTube, and it was part of his class project.
23 Those interviews were put on YouTube.

24 Q. Do you know if they're still available
25 on YouTube?

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1 A. I don't know.

2 Q. Did you ever complain to the school
3 about allowing him to use YouTube in connection
4 with a class project?

5 A. Did I complain? No.

6 Q. Are you aware of any other instances
7 where he used YouTube for homework assignments or
8 in the classroom?

9 A. Yes, I'm aware he's used YouTube for
10 homework assignments. In fact, his YouTube links
11 have been included in homework assignments from the
12 teacher to be able to watch a video at a
13 specific -- connected to a specific link.

14 Q. Is he a student at Harford County
15 Public Schools?

16 A. He is not.

17 Q. For your 26-year-old -- actually,
18 scratch that.

19 For your high school son, does he have
20 a cell phone?

21 A. Yes, he does.

22 Q. Is it a smartphone?

23 A. Yes, it is.

24 Q. When did he get his cell phone?

25 A. He got that cell phone in -- the

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1 particular one he has right now, he got it in
2 December for Christmas.

3 Q. When did he first get a cell phone?

4 A. That, I don't know. I got custody of
5 him when he was 11, and he already had a cell phone
6 at that time. So I don't know when his mom
7 provided his first cell phone to him.

8 Q. Did he -- when he was 11 and had a
9 phone, was it a smartphone?

10 A. Yeah. When he came to me, he had a
11 smartphone, yeah.

12 Q. And he has used a smartphone ever
13 since?

14 A. Yes.

15 Q. Before he started high school, did you
16 place any restrictions on how many hours a day he
17 could use his cell phone?

18 A. Yes.

19 Q. How many hours a day did you allow him
20 to use his phone?

21 A. No more than like one or two hours for
22 recreational use. And I had parental controls on
23 his phone.

24 Q. How did you enforce the time limit?

25 A. Because I could shut it down from my

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1 phone.

2 Q. How would you do that?

3 A. Going to -- going to the settings on my
4 phone because I had already set up the parental
5 controls. First of all, I had already filtered
6 where he couldn't go to certain -- he could go to
7 YouTube. In fact, up until about a year and a half
8 ago, he could go to YouTube, but there was certain
9 content he wouldn't be able to access because of
10 the way I set up the -- the permissions.

11 But in terms of how I controlled it, I
12 just go into the phone app into T-Mobile and go
13 into family controls, and I could just -- I can do
14 a number of things. I can make his phone where he
15 can just get incoming calls, can't make outgoing.

16 And like I said, up until about a year
17 and a half ago, I still exercised those. So I've
18 always had pretty good reins on his cell phone use.
19 It was never really an issue for him when it came
20 to school. Like, that wasn't something I was
21 getting called from school about, his cell phone
22 use, because I can control it.

23 Q. And those parental -- parental controls
24 that you were talking about, are they all through
25 the T-Mobile platform?

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1 A. Yes.

2 Q. Did you -- using your family or
3 parental controls that were on his device, did you
4 control them through his device?

5 A. No. So once it's registered and I'm
6 the owner of the account, the fact that his -- when
7 I first set his phone up, it asked if -- it went
8 through a series of things about asking about
9 permissions. And, you know, there were things that
10 I checked off.

11 And then I could control -- I could
12 even control his connections. If he was trying to
13 connect to Wi-Fi, I could just shut the -- I --
14 I could, from my phone, shut his Wi-Fi down on his
15 phone.

16 Q. So aside from those parental controls
17 from the T-Mobile phone setup, did you use any
18 other parental controls to monitor his screen time
19 or his use of his phone?

20 A. Periodically, I would check to see,
21 because I could also see what sites he visit. When
22 I went into my app, I could see what sites he went
23 to, what sites he visit. So, yes, I would
24 periodically do that.

25 Q. And you said you used these parental

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1 controls until about a year and half ago?

2 A. Yeah. When he was -- when he turned
3 16, I relaxed some of that stuff a little bit. He
4 was a little older now and showed responsibility,
5 so -- for some of the stuff. Some of the screening
6 I went on and took off.

7 Like, for instance, at 16 I wasn't
8 shutting his phone down at 9:00 where he couldn't
9 make phone calls and receive calls and all that,
10 not at 16.

11 Q. Do you still exercise some control over
12 his phone?

13 A. I absolutely do.

14 Q. What do you -- what do those controls
15 look like now?

16 A. On apps -- like, on the app that I have
17 on mine, I could -- if I want to shut down -- even
18 now, although he's 17, he's doing what he's
19 supposed to do, but if he wasn't, and I wanted to
20 shut down apps because I feel like he should be
21 focused on homework or a project or something, I
22 could go in. And he'll call me. He's like, "Did
23 you shut whatever down?"

24 "Yep, I sure did."

25 (Discussion off the record.)

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1 BY MS. WEIANT:

2 Q. For your older children -- let's start
3 with your 26-year-old. Did they have a phone in
4 high school?

5 A. My 26-year-old, did Kai have a phone in
6 high school? I'm going to say, yeah, he had a
7 phone in high school.

8 Q. Did you implement any controls over his
9 phone when he was in high school?

10 A. He didn't live with me.

11 THE REPORTER: I'm sorry. I didn't
12 hear you.

13 THE WITNESS: He didn't live with me.
14 I didn't provide his phone.

15 BY MS. WEIANT:

16 Q. What about your 32-year-old?

17 A. He didn't have a cell phone. She --
18 she -- I'm sorry. My 32-year-old is my daughter.
19 No, she did not have a cell phone in high school.

20 Q. And your 36-year-old, I assume, did not
21 have a cell phone --

22 A. No.

23 Q. -- in high school?

24 A. No. That was my 36 -- that was 18
25 years ago? No, he didn't have -- he didn't have a

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1 cell phone in high school.

2 Q. Have you ever asked YouTube to modify
3 any feature or function on YouTube?

4 MR. LEGG: Objection to form and
5 foundation.

6 THE WITNESS: I don't understand that
7 question.

8 BY MS. WEIANT:

9 Q. Have you ever asked YouTube to change a
10 feature or change something about how the platform
11 works?

12 MR. LEGG: Same objections.

13 THE WITNESS: How -- no.

14 BY MS. WEIANT:

15 Q. Have you ever asked YouTube to
16 discontinue any feature about how the -- or how the
17 platform works?

18 MR. LEGG: Objection to form and
19 foundation.

20 THE WITNESS: If I -- I want to
21 understand correctly. Like, as a -- as a consumer,
22 have I reached out to YouTube and say, I want you
23 to change how you're doing something -- a
24 particular thing on your platform? Is that what
25 you're asking me?

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1 BY MS. WEIANT:

2 Q. In any capacity, not just as a
3 consumer. But, yes, have you asked them?

4 A. No.

5 Q. Have you ever spoken with anyone at
6 Google or YouTube about YouTube?

7 MR. LEGG: Objection to form and
8 foundation.

9 THE WITNESS: No.

10 MS. WEIANT: All right. Let's take a
11 quick break.

12 THE VIDEOGRAPHER: We are now going off
13 the record at 3:59 p.m.

14 * * *

15 (Whereupon, there was a recess in the
16 proceedings from 3:59 p.m. to 4:15 p.m.)

17 * * *

18 THE VIDEOGRAPHER: We're now going back
19 on the record at 4:15 p.m.

20 BY MS. WEIANT:

21 Q. Do you have a Facebook account?

22 A. I do.

23 Q. When did you create that account?

24 A. 2009.

25 Q. How often do you use that account?

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1 A. Probably about once a week.

2 Q. How do you use that account?

3 A. I'll go on. If I don't post something,
4 I'll scroll.

5 Q. When scrolling on Facebook, how much
6 time do you scroll -- spend scrolling?

7 A. Not long. 15, 20 minutes just to
8 see -- just to see what the friends are doing or
9 family members or whatever, see if they posted
10 anything.

11 Q. Do you ever post to Facebook?

12 A. Yes.

13 Q. How often do you post -- post to
14 Facebook?

15 A. Whenever me and my wife take a
16 nice-looking picture together.

17 Q. How often would you say that is?

18 A. Oh, I think we're good-looking, so
19 pretty often.

20 Q. Do you have a Instagram account?

21 A. I do.

22 Q. When did you create that account?

23 A. I think about maybe a year or two ago.

24 Q. How do you use your Instagram account?

25 A. I really don't.

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1 Q. When was the last time you used your
2 Instagram account?

3 A. I think I used it to help me get back
4 into my Facebook account. They got -- something
5 happened with my Facebook, me forgetting my
6 Facebook password. I was reading something.

7 So probably over the past month, I
8 might have used it once or twice, but not using it
9 to post anything or anything like that.

10 Q. Have you ever posted anything to
11 Instagram?

12 A. Yes.

13 Q. When was the last time you posted
14 something to Instagram?

15 A. I don't remember.

16 Q. Do you use Instagram to keep up with
17 friends or family?

18 A. No.

19 Q. Do you have a TikTok account?

20 A. No.

21 Q. Do you have a Snapchat account?

22 A. No.

23 Q. Does your 17-year-old son have a
24 Facebook account?

25 A. Yes.

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1 Q. Do you know when he got his Facebook
2 account?

3 A. No, I don't know exactly when he got
4 it.

5 Q. Do you know how he uses his Facebook
6 account?

7 A. From what I've seen, mostly posts
8 basketball and track stuff, athletic stuff that
9 he's involved in.

10 Q. Do you know how often he uses Facebook?

11 A. I don't.

12 Q. Do you monitor how he uses Facebook?

13 A. Not at this point, no.

14 Q. Have you ever monitored how he uses
15 Facebook?

16 A. Yes.

17 Q. Is that through the same controls,
18 through T-Mobile that we discussed earlier?

19 A. That and by going to his account, his
20 Facebook account.

21 Q. How often did you go into his Facebook
22 account to monitor it?

23 A. Frequently when I was monitoring it.
24 Up until about the age of 15, pretty frequently.

25 Q. So until about two years ago --

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1 A. Yeah.

2 Q. -- you monitored -- you went into his
3 account and monitor it --

4 A. Yes.

5 Q. -- monitored it?

6 When you went into his account, what
7 did you monitor?

8 A. Who he was having communication with
9 and, you know, what he was posting, if he was
10 posting anything. But he wasn't really a big
11 poster. Even now, he's not a big poster if you go
12 to his page. He's never really been a major
13 poster-type guy.

14 Q. Does your 17-year-old son have an
15 Instagram account?

16 A. I don't know.

17 Q. Does your 17-year-old --

18 A. No, wait a minute. Instagram?

19 Q. Yes.

20 A. Yes, I'm pretty sure he has a Instagram
21 account.

22 Q. Do you know when he created his
23 Instagram account?

24 A. I don't.

25 Q. Do you know how he uses his Instagram

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1 account?

2 A. I don't.

3 Q. Do you know how often he uses his
4 Instagram account?

5 A. I don't.

6 Q. Do you place any time limits on how
7 often he uses his Instagram account?

8 A. No.

9 Q. Do you monitor his Instagram account?

10 A. No.

11 Q. Have you ever monitored his Instagram
12 account?

13 A. No.

14 Q. Does your 17-year-old son have a TikTok
15 account?

16 A. That, I don't know.

17 Q. Does your 17-year-old son have a
18 Snapchat account?

19 A. That, I don't know either.

20 Q. Have you ever asked Facebook to modify
21 any feature or function on its platform?

22 MR. LEGG: Objection to form.
23 Foundation.

24 THE WITNESS: Un-hun. No. I'm sorry.
25 No.

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1 BY MS. WEIANT:

2 Q. Have you ever asked Instagram to modify
3 any feature or function on its platform?

4 A. Ask who?

5 MR. LEGG: Objection to form and
6 foundation.

7 BY MS. WEIANT:

8 Q. Instagram.

9 A. No.

10 Q. Have you ever asked TikTok to modify
11 any feature or function on its platform?

12 A. No.

13 MR. LEGG: Objection to form.
14 Foundation.

15 BY MS. WEIANT:

16 Q. Have you ever asked Snapchat to modify
17 any feature or function on its platform?

18 MR. LEGG: Objection to form and
19 foundation.

20 THE WITNESS: No.

21 BY MS. WEIANT:

22 Q. Have you ever asked any of those
23 platforms to discontinue any feature or function?

24 MR. LEGG: Objection to form and
25 foundation.

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1 THE WITNESS: No.

2 BY MS. WEIANT:

3 Q. Have you ever spoken with anyone at any
4 of those platforms about -- about their platforms?

5 A. No.

6 MR. LEGG: Objection to form and
7 foundation.

8 THE WITNESS: No.

9 BY MS. WEIANT:

10 Q. Earlier today, you testified that you
11 have not been a schoolteacher; is that right?

12 A. Correct.

13 Q. So you are not in classrooms on a
14 regular basis?

15 A. That's correct.

16 Q. You can't speak to how students are
17 typically using their cell phones or electronic
18 devices in the classroom, can you?

19 A. No.

20 Q. You can't speak to what websites they
21 are looking at?

22 A. No.

23 Q. You can't speak to what apps they are
24 using?

25 A. No.

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1 Q. You can't speak to how students are
2 using -- are typically using their cell phones or
3 electronic devices at school generally, can you?

4 MR. LEGG: Objection to form and
5 foundation.

6 THE WITNESS: How they are using it
7 generally? How they are using it, no.

8 BY MS. WEIANT:

9 Q. So the first questions were about how
10 they were using their devices in the classroom.

11 A. Right.

12 Q. The second one, you can't speak to how
13 they are typically using their cell phones at
14 school more generally, can you?

15 MR. LEGG: Same objections.

16 THE WITNESS: No.

17 BY MS. WEIANT:

18 Q. You can't say what websites they are
19 looking at while using their phones at school?

20 MR. LEGG: Objection to form --

21 THE WITNESS: No.

22 MR. LEGG: -- and foundation.

23 BY MS. WEIANT:

24 Q. You can't say what apps they are using
25 while using their phones at school?

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1 MR. LEGG: Same objections.

2 THE WITNESS: No.

3 BY MS. WEIANT:

4 Q. Do you have any data about how often
5 students use cell phones or electronic devices?

6 A. No.

7 Q. Do you have any data about how much
8 time students are spending on their cell phones or
9 electronic devices?

10 A. No.

11 Q. Do you have any data about how often
12 students use social media?

13 A. No.

14 Q. Do you have any data about how much
15 time they spend on social media?

16 A. No.

17 Q. Do you have any data about how students
18 use social media?

19 A. No.

20 Q. Earlier today, you testified that you
21 were not a school counselor, right?

22 A. Correct.

23 Q. So have you counseled any Harford
24 County Public School students about social media
25 addiction?

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1 A. About addiction, no.

2 Q. Have you counseled any Harford County
3 Public School students about problems resulting
4 from their use of social media?

5 A. No.

6 Q. Do you have any data on how many
7 Harford County Public School students are counseled
8 or treated for social media addiction?

9 A. No.

10 Q. Do you have any data on how many
11 Harford County Public School students are counseled
12 or treated for mental health issues?

13 A. No.

14 Q. Do you have any data on how many
15 Harford County Public School students are counseled
16 or treated for anything connected to their use of
17 cell phones?

18 A. No.

19 Q. Do you have any data on how many
20 Harford County Public School students are counseled
21 or treated for anything connected to their use of
22 social media?

23 A. No.

24 Q. So you can't speak to how many Harford
25 County Public School students have social media

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1 addiction, can you?

2 MR. LEGG: Objection to form and
3 foundation.

4 THE WITNESS: No.

5 BY MS. WEIANT:

6 Q. You can't speak to how many Harford
7 County Public School students have experienced any
8 kind of mental health problems because of their use
9 of social media?

10 MR. LEGG: Objection to form and
11 foundation.

12 THE WITNESS: No.

13 BY MS. WEIANT:

14 Q. You would agree that students can make
15 threats in a variety of ways, correct?

16 MR. LEGG: Objection to form and
17 foundation.

18 THE WITNESS: I would agree.

19 BY MS. WEIANT:

20 Q. Earlier today, we looked at a document
21 with an example of a threat written on a desk; is
22 that right?

23 A. Yes.

24 Q. Some threats are made by making a phone
25 call?

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1 A. Yes.

2 Q. Some threats can be made by text
3 message?

4 A. Yes.

5 Q. Some threats occur in person without
6 the involvement of any devices?

7 A. Yes.

8 Q. And you have had experience acting on
9 some threats being made on social media, right?

10 A. Yes.

11 Q. Or with -- you've had some experience
12 with fights or other violence that was promoted on
13 social media?

14 A. Yes.

15 Q. Separate from responding to threats,
16 fights or violence that may have been promoted on
17 social media, your work doesn't involve issues
18 related to student use of social media, does it?

19 MR. LEGG: Objection. Form.
20 Foundation.

21 THE WITNESS: My work doesn't relate to
22 students' use of social media?

23 BY MS. WEIANT:

24 Q. Aside from --

25 A. Oh, responding to the threat. No.

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1 Q. Your work is focused on addressing
2 these threats and incidents and keeping students
3 safe and not evaluating the specific role that
4 social media plays in the matters you're handling,
5 right?

6 MR. LEGG: Objection to form and
7 foundation.

8 THE WITNESS: Correct.

9 MS. WEIANT: I have no further
10 questions at this time.

11 Does anybody on the Zoom have any
12 questions?

13 MR. COTLER: No questions from Snap.

14 MR. FLASTER: No questions from Meta.

15 MS. JACKSON: Nothing from TikTok.

16 MR. LEGG: I will reserve my questions
17 for trial.

18 THE VIDEOGRAPHER: We are now going off
19 the record at 4:27 p.m.

20 This now concludes today's video
21 testimony given by Donovan Brooks.

22 Total time for Google/YouTube is 3
23 hours and 32 minutes.

24 (WHEREUPON, the deposition was
25 concluded at 4:27 p.m.)

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(Signature Reserved.)

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DEPOSITION ERRATA SHEET

Case Caption: In Re: Social Media Adolescent
Addiction/Personal Injury Liability Litigation

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that
I have read the entire transcript of my deposition
taken in the captioned matter or the same has been
read to me, and the same is true and accurate, save
and except for changes and/or corrections, if any,
as indicated by me on the DEPOSITION ERRATA SHEET
hereof, with the understanding that I offer these
changes as if still under oath.

Signed on the _____ day of
_____, 20____.

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CERTIFICATE OF REPORTER

I, Cindy A. Hayden, Registered Merit Reporter and Notary Public for the State of Maryland, do hereby certify:

That the foregoing deposition was taken before me on the date and at the time and location stated on Page 1 of this transcript; that the deponent was duly sworn to testify to the truth, the whole truth and nothing but the truth; that the testimony of the deponent and all objections made at the time of the examination were recorded stenographically by me and were thereafter transcribed; that the foregoing deposition as typed is a true, accurate and complete record of the testimony of the deponent and of all objections made at the time of the examination to the best of my ability.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof. Witness my hand, this 9th of May, 2025.



Cindy A. Hayden,
Registered Merit Reporter
Notary Public
State of Maryland
My Commission expires:
April 26, 2029